



1/8/2015

Mr. Michael Tordella
 Metokote Corporation Plant 25
 1340 Neubrecht Road
 Lima, OH 45801

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 0302020064
 Permit Number: P0118266
 Permit Type: OAC Chapter 3745-31 Modification
 County: Allen

Certified Mail

Yes	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
 77 South High Street, 17th Floor
 Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)3528461 or the Office of Compliance Assistance and Pollution Prevention at (614)644-3469.

Sincerely,



Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-NWDO; Indiana



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Metokote Corporation Plant 25**

Facility ID: 0302020064
Permit Number: P0118266
Permit Type: OAC Chapter 3745-31 Modification
Issued: 1/8/2015
Effective: 1/8/2015



Division of Air Pollution Control
Permit-to-Install
for
Metokote Corporation Plant 25

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Final Permit-to-Install
Metokote Corporation Plant 25
Permit Number: P0118266
Facility ID: 0302020064
Effective Date: 1/8/2015

Authorization

Facility ID: 0302020064
Facility Description: Metal coating and allied services.
Application Number(s): A0052473
Permit Number: P0118266
Permit Description: Chapter 31 modification to allow the use of manual spray wet coatings on Line 42 (K001).
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$200.00
Issue Date: 1/8/2015
Effective Date: 1/8/2015

This document constitutes issuance to:

Metokote Corporation Plant 25
1340 Neubrecht Road
Lima, OH 45801

of a Permit-to-Install for the emissions unit(s) identified on the following page.

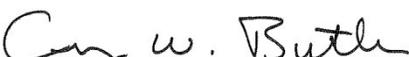
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Final Permit-to-Install
Metokote Corporation Plant 25
Permit Number: P0118266
Facility ID: 0302020064
Effective Date: 1/8/2015

Authorization (continued)

Permit Number: P0118266
Permit Description: Chapter 31 modification to allow the use of manual spray wet coatings on Line 42 (K001).

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	K001
Company Equipment ID:	Line 42 is now converted to a hand coating Wet Paint Line.
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Metokote Corporation Plant 25
Permit Number: P0118266
Facility ID: 0302020064
Effective Date: 1/8/2015

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted



local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.



8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the



Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.



13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



Final Permit-to-Install
Metokote Corporation Plant 25
Permit Number: P0118266
Facility ID: 0302020064
Effective Date: 1/8/2015

B. Facility-Wide Terms and Conditions



Final Permit-to-Install
Metokote Corporation Plant 25
Permit Number: P0118266
Facility ID: 0302020064
Effective Date: 1/8/2015

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.



Final Permit-to-Install
Metokote Corporation Plant 25
Permit Number: P0118266
Facility ID: 0302020064
Effective Date: 1/8/2015

C. Emissions Unit Terms and Conditions



1. K001, Line 42 is now converted to a hand coating Wet Paint Line.

Operations, Property and/or Equipment Description:

Hand coating wet paint line #4-MOP-2 (Line #42)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)d., d)(7) through d)(10) and e)(2).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC rule 3704.03(T) [Best Available Technology (BAT) for pollutants greater than 10 tons per year]	Volatile Organic Compound (VOC) emissions shall not exceed 0.05 tons per month averaged over a 12-month rolling period for cleanup operations See b)(2)a.
b.	OAC rule 3745-17-11(C)	See c)(1), c)(2), d)(2) through d)(6) and e)(1).
c.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(7) through d)(10) and e)(2).
d.	OAC rule 3745-21-09(U)(1)(i)	3.0 lbs of VOC per gallon of coating, excluding water and exempt solvents, for all coatings
e.	40 CFR, Part 63, Subpart M (See 40 CFR 63.3880 et seq.) [In accordance with 40 CFR 63.3881, this is a general use metal coating emissions unit, at an existing miscellaneous metal parts and products surface coating facility.]	<u>63.3890(b)(1) or 63.3890(c):</u> Emissions of organic hazardous air pollutants (HAPs) shall not exceed 0.31 kg (2.6 lb) per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii). See b)(2)b. through b)(2)d.
f.	40 CFR 63.1-15	Table 2 to Subpart M of 40 CFR Part 63- Applicability of General Provisions to Subpart M shows



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements established pursuant to ORC rule 3704.03(T) have been determined to be equivalent to 40 CFR, Part 63, Subpart Mmmm for coating operations and compliance with the tons per month average over a rolling, 12-month period established in b)(1)a. for cleanup operations.
- b. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart Mmmm.

The final rules found in 40 CFR Part 63, Subpart Mmmm establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for miscellaneous metal parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of miscellaneous metal parts and products:

- i. all coating operations as defined in 40 CFR 63.3981;
- ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and
- iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee is subject to this NESHAP in accordance with the compliance date specified in 40 CFR 63.3883.

- c. The permittee has elected to use the compliance option provided by 40 CFR 63.3891(b) – emission rate without add-on controls. This is accomplished by demonstrating that the organic HAP emission rate for the coating operation, including thinners and/or other additives and cleanup materials, is less than or equal to the applicable emission limit in 63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee may use any of the three compliance options [63.3891(a), (b), or (c)], as described in 63.3891,



however, the permittee must meet all of the stated requirements of each option when it is used. [See 40 CFR 63.3880-63.3981].

- d. For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.3890 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.3951 and 63.3952.
- e. The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.0 pounds per gallon, as applied, excluding water and exempt solvents.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (3) If the permittee can meet the emission limitation(s) contained in 40 CFR 63.3890 without add-on controls, by calculating the rolling, 12-month HAP emission rate at the end of each month, the permittee shall not be required to meet the operating limits contained in 40 CFR 63.3892 or work practice standards contained in 40 CFR 63.3893.
- (4) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the Director



(appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency), which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or other standard operating procedures), operation and maintenance records, and inspection of the facility.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of the VOC emissions from the cleanup operations for this emissions unit; and at the end of 12 months of operation, the rolling 12 month summation of VOC emissions and the average calculated over each rolling 12-month period.

Note: The above records shall be determined in accordance with the emissions calculations presented to the Ohio EPA in the permit application submitted by the permittee.

- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.



- (6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (7) The Permit-to-Install (PTI) application for this emissions unit, K001, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$



- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: xylene (ethyl benzene)

TLV (mg/m³): 434.19

Maximum Hourly Emission Rate (lbs/hr): 1.73

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 10,333

MAGLC (ug/m³): 975.9

The permittee, has demonstrated that emissions of xylene (ethyl benzene), from emissions unitK001, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (8) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a “modification” under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.



- (9) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (10) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (11) The permittee shall collect and record the following information each month for this emissions unit:
- a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the miscellaneous metal parts coating operation(s), including information from the supplier or manufacturer, formulation data, and/or coating/material testing data;
 - b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;
 - c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;
 - d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:



- i. Method 311 from 40 CFR Part 63, Appendix A;
 - ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP;
 - iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pounds HAP/gallon of material ÷ pounds/gallon of material, or calculated in kg/liter); or
 - iv. solvent blends listed as single components and where neither test data nor manufacturer's data is available, default values from Table 3 to Subpart M MMM or Table 4 if not listed in Table 3, can be used.
- e. the volume fraction of coating solids (gallon of coating solids/gallon of coating or liter of coating solids/liter of coating) for each coating applied which can be calculated using one of the following methods:
- i. divide the nonvolatile volume percent, obtained from either ASTM Method D2697-86 ("Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings") or Method D6093-97 ("Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer"), by 100 to convert percent to the volume fraction of coating solids; or
 - ii. calculated from: $V_s = 1 - m_{\text{volatiles}} / D_{\text{avg}}$
where:
 V_s is the volume fraction of coating solids, in gallon of coating solids/gallon of coating or liter of coating solids/liter of coating;
 $m_{\text{volatiles}}$ is the total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined in accordance to Method 24 in Appendix A of 40 CFR Part 60, in pound of volatile matter per gallon of coating or grams volatile matter per liter of coating;
 D_{avg} is the average density of volatile matter in the coating, i.e., pound of volatile matter per gallon of volatile matter or grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98 "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" or from information provided by the supplier or manufacturer, or from reference sources providing density or specific gravity data for pure materials; or
 - iii. the volume fraction of coating solids can be calculated using information provided by the manufacturer, by using the following information to convert percent by weight to percent by volume, if not provided directly:



- (a) for each coating, change the percent by weight solids, percent by weight water, and percent by weight total solvent to the same number of “pounds” or “kilograms” (by assuming 100 pounds {or kg} of coating is applied) and divide each component’s assumed “weight” by its density in the coating, to get the gallons of solids, gallons of water, and gallons of solvent;
 - (b) add the gallons of solids, gallons of water, and gallons of solvent from d)(2)e.iii.(a); and
 - (c) divide the gallons of solids, from d)(2)e.iii.(a), by the sum of the gallons of coating components from d)(2)e.iii.(b), to get the volume fraction of coating solids (gallon of coating solids per gallon of coating or liter of coating solids per liter of coating);
- f. the total mass of organic HAP (pound or kg) in all of the coatings, thinners/additives, and cleanup/purge materials (as purchased) applied during the month, calculated separately for coatings, thinners/additives, and cleanup/purge materials as follows:

$$HAP = \sum_{i=1}^r (VOL_i)(D_i)(W_i)$$

where:

HAP is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials used each month, in pound or kg of HAP for each: 1. the coatings (HAP_c), 2. thinners/additives (HAP_t), and 3. cleanup/purge materials (HAP_{cu}).

VOL_i is the volume of material “i” documented in d)2)b., in gallons or liters.

D_i is the density of material “i” as documented in d)(2)c., in pounds/gallon or kg/liter.

W_i is the mass fraction of organic HAP in material “i” as calculated in d)(2)d., in pound/pound or kg/kg.

r is the number of coatings, the number of thinners/additives, or the number of cleanup/purge materials used during the month, each source (coating, thinner/additive, cleanup/purge) calculated separately for its HAP.

- g. the total mass of organic HAP emissions for each month, calculated as follows:

$$HAP_{TOT} = HAP_c + HAP_t + HAP_{cu} - R_w$$



where:

HAP_{TOT} is the total mass of organic HAP emissions for the month, in pound or kg.

HAP_c is the total mass of organic HAP in all the coatings used during the month, summed from the total mass of HAP calculated from all the coatings applied, as required in d)(2)f., in pound or kg.

HAP_t is the total mass of organic HAP in all the thinners and additives used during the month, summed from the total mass of HAP calculated from all the thinners/additives applied, as required in d)(2)f., in pound or kg.

HAP_{cu} is the total mass of organic HAP in all cleanup and purge materials used during the month, summed from the total mass of HAP calculated from all the cleanup/purge materials applied, as required in d)(2)f., in pound or kg.

R_w is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste treatment, storage, and disposal facility (TSDF) for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to R_w if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for recovery or disposal).

- h. the total volume of coating solids applied during the month, calculated as follows:

$$VOL_s = \sum_{h=1}^m (VOL_h)(V_h)$$

where:

VOL_s is the total volume of coating solids used during the month, in gallons or liters.

VOL_h is the total volume of coating “h” used during the month, as documented in d)(2)b., in gallons or liters.

V_h is the volume fraction of coating solids for coating “h”, in liter of solids per liter coating or gallon of solids per gallon of coating, calculated as required in d)(2)e.

m is the number of coatings applied during the month.

- i. the total organic HAP emission rate for the 12-month compliance period, in pound of HAP per gallon of coating solids or kg of HAP per liter of coating solids applied during the rolling, 12-month compliance period, calculated as follows:



$$HAP_{comply} = \frac{\sum_{y=1}^n HAP_{TOT,y}}{\sum_{y=1}^n VOL_{s,y}}$$

where:

HAP_{comply} is the total organic HAP emission rate for the 12-month compliance period, in pound organic HAP emitted per gallon of coating solids applied or kg organic HAP emitted per liter of coating solids applied.

$HAP_{TOT, y}$ is the total mass of organic HAP emissions from all materials used during month y, calculated in d)(2)g., in pound or kg.

$VOL_{s, y}$ is the total volume of coating solids used during month y, calculated in d)(2)h., in gallons or liters.

y is the identifier for the month.

n is the number of full or partial months in the compliance period; for the initial compliance period, n equals 13 where the compliance date does not fall on the first day of the month; for all following compliance periods n equals 12; and

- j. all calculations required above for each monthly rolling, 12-month compliance period.

In order to demonstrate continuous compliance, the organic HAP emission rate for each rolling, 12-month compliance period must be less than or equal to the applicable emission limit in 40 CFR 63.3890. The compliance demonstration shall be conducted on a monthly basis, using the data from the previous 12 months of operation, as documented through the above calculations and records.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

- (12) The permittee shall also maintain the following records for the miscellaneous metal parts coating line:
 - a. a copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.3890 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;
 - b. if using the predominant activity alternative under 40 CFR 63.3890(c)(1), the records of the data and calculations used to determine the predominant activity;
 - c. if using the "facility-specific" emission limit under 40 CFR 63.3890(c)(2), the data used to calculate the "facility-specific" emission limit; and



- d. the date, time, and duration of use, and the amount of any material applied in the compliant coating operations that did not meet the requirements of the “compliant material” option.

If demonstrating compliance with a predominant activity determination or a “facility-specific” emission limit, all coating operations included in the predominant activity determination or calculation of the “facility-specific” emission limit must comply with the applicable limit and requirements for the “compliant material” option.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

- (13) If using the allowance for an emission reduction of the uncontrolled/pre-controlled emissions for organic HAP contained in waste materials sent to (or designated for shipment to) a hazardous waste TSDF during the month, the permittee shall maintain records of the following information:
 - a. the name and address of each hazardous waste TSDF to which waste materials were sent or are scheduled to be sent, and for which an allowance was applied to the calculated uncontrolled/pre-controlled emissions;
 - b. a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to each hazardous waste TSDF;
 - c. for each allowance applied in any month:
 - i. the volume, weight, and source of recovered material collected and an identification of the coating operations producing the waste materials;
 - ii. the month the allowance was applied and the mass of organic HAP used as the allowance, including the calculations;
 - iii. the date the recovered material was shipped and its volume and weight (excluding the weight of the container) at the time of shipment to the hazardous waste TSDF and the manifest number accompanying the shipment;
 - iv. the methodology used to determine the total amount of waste materials collected;
 - v. the methodology used to determine the mass of organic HAP contained in the wastes, sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting



calculations and documentation, including the waste manifest for each shipment; and

- d. for each container of recovered materials shipped to a hazardous waste TSD, the following records shall be maintained in a log:
 - i. the date each container was first used and the date of the last addition;
 - ii. the date and amount of recovered materials added, from first to the last addition;
 - iii. the date the container was shipped and identification of which hazardous waste TSD it was shipped to, if more than one facility in (a) above; and
 - iv. the volume and weight of the material as it was recorded on the waste manifest (minus the weight of the container, if included).

(14) The permittee shall collect and record the following information each month for all coatings employed in this emission unit:

- a. The name and identification of each coating as applied; and
- b. The VOC content of each coating, excluding water and exempt solvents, in lbs/gallon as applied (the VOC content shall be calculated in accordance with the equation specified in paragraph (b)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:
 - a. the original model input;
 - b. the updated model input;
 - c. the reason for the change(s) to the input parameter(s); and



- d. a summary of the results of the updated modeling, including the input changes; and
- e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions unit, or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect.

- (3) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is the 6-month period ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:

- a. company name and address;
- b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);
- c. the date of the report and beginning and ending dates of the reporting period;
- d. identification of the compliance method as either the "compliant material" option or the "without add-on control" option;
- e. statement of whether the affected source achieved the emission limitations for the compliance period;
- f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period for the uncontrolled coating operations or the limitation from 40 CFR 63.3890 for each type of compliant coating applied;
- g. if using the predominant activity alternative according to 40 CFR 63.3890(c)(1), the annual determination of predominant activity if it was not included in the previous semi-annual compliance report;
- h. if using the "facility-specific emission limit" alternative according to 40 CFR 63.3890(c)(2), the calculation of the "facility-specific" emission limit for each 12-month compliance period during the 6-month reporting period;
- i. if there were no deviations from the emission limitations in 63.3890, a statement that there were no deviations from the emissions limitations during the reporting period; and
- j. if there were any deviations during the compliance period for the coating operations demonstrating compliance without add-on control, the report shall include the following information:



- i. the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;
 - ii. the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);
 - iii. if applicable, the calculation used to determine mass of organic HAP in waste materials; and
 - iv. a statement of the cause of each deviation.
- (4) The permittee shall include the following information in the semiannual report for any monthly record where the allowance for an emission reduction was applied in the uncontrolled/pre-controlled HAP emissions calculations for materials that were shipped (or scheduled to be shipped) to a hazardous waste TSDF:
- a. any monthly record where measurements were not taken or appropriate records were not maintained for recovered material(s) that were applied as an emission reduction in the calculated HAP emissions before add-on controls and used to demonstrate compliance with the NESHAP and the limitations in this permit;
 - b. any record of recovered solvent that was not finally shipped to a hazardous waste TSDF and/or was shipped to a TSDF not regulated under 40 CFR Parts 262, 264, 265, or 266 and which was also applied as an emission reduction to HAP emissions prior to add-on controls;
 - c. any record of discrepancy between the total volume or weight of material(s) collected and the total volume shipped to a hazardous waste TSDF, as documented in the recovered materials log;
 - d. any record of recovered material being applied more than one time in a monthly compliance demonstration; and/or
 - e. a miscalculation of the HAP emission reduction calculation for recovered materials sent to a hazardous waste TSDF.
- (5) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing the application of a coating with greater than 3.0 pounds VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of each such record and it shall be sent to the appropriate District Office or local air agency within 30 days following the end of the calendar month during which the non-compliant coating was applied.
- f) Testing Requirements



(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

VOC emissions shall not exceed 0.05 tons per month averaged over a 12-month rolling period for cleanup operations

Applicable Compliance Method:

Compliance with the emission limitation above shall be based upon the monitoring and recordkeeping requirements specified in d)(1).

b. Emission Limitations:

Emissions of organic hazardous air pollutants (HAPs) shall not exceed 0.31 kg (2.6 lb) per liter (gal) coating solids used during each 12-month compliance period, or emissions of organic HAPs shall not exceed a facility-wide emissions limit calculated in accordance with 63.3890(c)(2)(i) through 63.3890(c)(2)(iii).

Applicable Compliance Method:

Compliance with the emission limitation above shall be based upon the monitoring and record keeping requirements specified in d)(11).

c. Emissions Limitation:

3.0 lbs of VOC per gallon of coating, excluding water and exempt solvents, for all coatings

Applicable Compliance Method:

Compliance with the emission limitation above shall be based upon the monitoring and record keeping requirements specified in d)(14).

g) Miscellaneous Requirements

(1) None.