John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

1/23/2015

Certified Mail

No	TOXIC REVIEW
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

MIKE KUBRIN
Schneller LLC
6019 POWDERMILL RD.
KENT, OH 44240-7109

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1667040015
Permit Number: P0117426
Permit Type: Renewal
County: Portage

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. 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 PTIO 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 Akron Regional Air Quality Management District at (330)375-2480 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: ARAQMD

Response to Comments

Facility ID:	1667040015
Facility Name:	Schneller LLC
Facility Description:	Coated Fabrics, Not Rubberized.
Facility Address:	6019 POWDERMILL RD. Kent, OH 44240-7109 Portage County
Permit:	P0117426, Permit-To-Install and Operate - Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Record Courier on 12/17/2014. The comment period ended on 01/16/2015.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

a. **No comments received.**

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Schneller LLC

Facility ID:	1667040015
Permit Number:	P0117426
Permit Type:	Renewal
Issued:	1/23/2015
Effective:	1/23/2015
Expiration:	1/23/2020

Division of Air Pollution Control
Permit-to-Install and Operate
for
Schneller LLC

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Authorization

Facility ID:	1667040015
Application Number(s):	M0002926, M0002927, M0002928
Permit Number:	P0117426
Permit Description:	Federally Enforceable Permit to Install and Operate administrative modification to Permits to Install P0108225, P0109415 and P0110611 issued final on 6/28/2011, 2/9/2012 and 12/3/2012, respectively, to establish federally-enforceable, facility-wide, synthetic minor emission limits to avoid being a major source for Nonattainment New Source Review, Title V and 40 CFR Part 63, Subpart KK. For emissions units K005 and K006, removed the OAC rules 3745-17-07(A) and 3745-17-10 requirements which were incorrectly cited as applicable rules. This permit includes two silkscreen printing machines (K006 and K009), four coating lines (K001, K003, K004 and K005), eight mixers (P002 which includes 5 mixers, P011, P012 and P014) and vat drying (P008).
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	1/23/2015
Effective Date:	1/23/2015
Expiration Date:	1/23/2020

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Schneller LLC
6019 POWDERMILL RD.
Kent, OH 44240-7109

of a Permit-to-Install and Operate 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:

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0117426
Permit Description: Federally Enforceable Permit to Install and Operate administrative modification to Permits to Install P0108225, P0109415 and P0110611 issued final on 6/28/2011, 2/9/2012 and 12/3/2012, respectively, to establish federally-enforceable, facility-wide, synthetic minor emission limits to avoid being a major source for Nonattainment New Source Review, Title V and 40 CFR Part 63, Subpart KK. For emissions units K005 and K006, removed the OAC rules 3745-17-07(A) and 3745-17-10 requirements which were incorrectly cited as applicable rules. This permit includes two silkscreen printing machines (K006 and K009), four coating lines (K001, K003, K004 and K005), eight mixers (P002 which includes 5 mixers, P011, P012 and P014) and vat drying (P008).

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

Emissions Unit ID:	**P008**
Company Equipment ID:	Vat Drying
Superseded Permit Number:	P0110611
General Permit Category and Type:	Not Applicable

Group Name: Coaters

Emissions Unit ID:	**K001**
Company Equipment ID:	80-LINE
Superseded Permit Number:	P0109415
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	100-LINE
Superseded Permit Number:	P0109415
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K004**
Company Equipment ID:	90-LINE
Superseded Permit Number:	P0109415
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K005**
Company Equipment ID:	ROTARY SCREEN
Superseded Permit Number:	P0109415
General Permit Category andType:	Not Applicable

Group Name: Compounding

Emissions Unit ID:	**P002**
Company Equipment ID:	COMPOUND DEPT.
Superseded Permit Number:	P0108225
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P011**
Company Equipment ID:	CMD Cowles #5 Mixer
Superseded Permit Number:	P0110611
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P012**
Company Equipment ID:	CMD Cowles #6 Mixer
Superseded Permit Number:	P0110611
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P014**

Company Equipment ID:	CMD Cowles #8 Mixer
Superseded Permit Number:	P0110611
General Permit Category andType:	Not Applicable

Group Name: Silkscreen Printing

Emissions Unit ID:	**K006**
Company Equipment ID:	SILKSCREEN
Superseded Permit Number:	P0109415
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**K009**
Company Equipment ID:	Screen Print #2
Superseded Permit Number:	P0110611
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee.This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee.Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) 2, 3, 4 and 5.

2. SchnellerLLC has requested to restrict the emissions of volatile organic compounds (VOC), any individual hazardous air pollutant (HAP)[1] and combined HAPs to 80.0 tons per year, 8.0 tons per year* and 20.0 tons per year*, respectively, based upon the rolling, 12-month summation of the monthly emissions. Schneller proposed these emission limitations to avoid being classified as a major source for Nonattainment New Source Review (NSR) and Title V permitting and to establish the facility as an area source for the National Emission Standards for the Printing and Publishing Industry, 40 CFR Part 63, Subpart KK.Schneller, LLC has accepted these emission limitations as a facility-wide cap on VOC, any individual HAP and combined HAPs emissions from the following emissions units: K001, K003, K004, K005, K006, K009, P002, P008, P011, P012 and P014.

   *The emission limitations for any individual HAP and combined HAPs include the HAP emissions from the permit exempt and “De Minimis” sources.

3. In order to determine compliance with the facility-wide VOC, any individual HAP and combined HAPs emission limitations, the permittee shall maintain monthly records of the following information for emissions units: K001, K003, K004, K005, K006, K009, P002, P008, P011, P012 and P014.

   a) The permittee shall collect and record the following information each month for each controlled emissions units K001, K003, K004 and K005:

      (1) the name and identification number/code of each coating[2], cleanup material and any other material containing any VOC and/or any HAP;

      (2) the VOC content of each material applied, in pounds per gallon or weight fraction, i.e., pound of VOC per pound of material applied;

      (3) the name/identification of each individual HAP contained in each material applied (and identified in a)(1) above) and the pound(s) of each HAP per gallon of each HAP-containing material applied or the weight fraction of each individual HAP contained in each material applied (and identified in a)(1) above) i.e., pound of each individual HAP per pound of each HAP-containing material applied;

      (4) the number of gallons or pounds of each coating, cleanup material and other material applied during the month;

(5) the total uncontrolled VOC emissions for each emissions unit from the coating operations for the month, in ton(s), i.e., the summation of the products of a)(2) times a)(4) for all the coating materials (not including cleanup materials) applied during the month, divided by 2,000 pounds per ton;

(6) the total uncontrolled VOC emissions for each emissions unit from the cleanup materials employed, in ton(s), i.e., the summation of the products of a)(2) times a)(4) for all the cleanup materials applied during the month, divided by 2,000 pounds per ton;

(7) for each individual HAP, the total uncontrolled emissions from the coating operations for the month, in ton(s), i.e., for each individual HAP, the summation of the products of a)(3) times a)(4) for all the coating materials (not including cleanup materials) applied during the month, divided by 2,000 pounds per ton;

(8) for each individual HAP, the total uncontrolled emissions from the cleanup materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of a)(3) times a)(4) for all the cleanup materials applied during the month, divided by 2,000 pounds per ton;

(9) the total VOC emissions for each emissions unit, the sum of (i) the calculated, controlled emission rate from all the coating materials (not including cleanup materials) applied during the month, in ton(s), i.e., the total uncontrolled VOC emission rate calculated in a)(5) above, multiplied by (1 minus the overall control efficiency for the control equipment), as determined during the most recent emissions test that demonstrated the emissions unit was in compliance, and (ii) the uncontrolled VOC emissions from the cleanup materials employed during the month, as calculated in a)(6) above;

(10) for each individual HAP, the sum of (i) the calculated, controlled emission rate from all the coating materials (not including cleanup materials) applied during the month, in ton(s), i.e., the total uncontrolled individual HAP emission rate calculated in a)(7) above, multiplied by (1 minus the overall control efficiency for the control equipment), as determined during the most recent emissions test that demonstrated the emissions unit was in compliance, and (ii) the uncontrolled individual HAP emissions from the cleanup materials employed during the month, as calculated in a)(8) above.

[2]Each identified coating is as-applied at the coater and includes all thinners and additives; a single coating name may be used for multiple similar coatings but will be identified with the highest-emitting VOC and HAP contents of any individual group member.

b) The permittee shall collect and record the following information each month for emissions units K006 and K009, combined:

(1) the name and identification number/code of each coating[2], cleanup material and any other material containing any VOC and/or HAP;

(2) the VOC content of each material applied, in pounds per gallon or weight fraction, i.e., pound of VOC per pound of material applied;

(3) the name/identification of each individual HAP contained in each material applied (and identified in b)(1) above) and the pound(s) of each HAP per gallon of each HAP-

containing material appliedor the weight fraction of each individual HAP contained in each material applied (and identified in b)(1) above) i.e., pound of each individual HAP per pound of each HAP-containing material applied;

(4) the number of gallons or pounds of each coating, cleanup material and other material applied during the month;

(5) the total VOC emissions from all the materials applied, in ton(s), i.e., the summation of the products of b)(2) times b)(4) for all the materials applied during the month, divided by 2000 pounds per ton;

(6) for each individual HAP, the total emissions from all the materials applied, in ton(s), i.e., for each individual HAP, the summation of the products of b)(3) times b)(4) for all the materials applied during the month, divided by 2,000 pounds per ton.

[2]Each identified coating is as-applied at the coater and includes all thinners and additives; a single coating name may be used for multiple similar coatings but will be identified with the highest-emitting VOC and HAP contents of any individual group member.

c) The permittee shall collect and record the following information each month for emissions units P002, P011, P012 and P014, combined:

(1) the amount of material mixed, in pounds per month;

(2) the VOC emission rate from the mixing operation, excluding cleanup material, in ton(s) per month, i.e., multiply the emission factor of 0.00356* pound of VOC per pound of material mixed by c)(1), divided by 2000 pounds per ton;

(3) the amount of each HAP-containing material applied in the controlled coating lines, in gallons per month;

(4) for each individual HAP, the HAP content of each HAP-containing material applied in the controlled coating lines, in pounds per gallon;

(5) for each individual HAP,individual HAP emission rate from the mixing operation, excluding cleanup material, in ton(s) per month, by conservatively assuming that all VOC emissions are HAP, i.e., multiply the emission factor of 0.00356* pound of VOC per pound of material mixed by c)(3) times c)(4), divided by 2000 pounds per ton;

(6) the name and identification of each cleanup material employed;

(7) the VOC content of each cleanup material, in pounds of VOC per gallon;

(8) for each individual HAP, the pound(s) of each HAP per gallon of each HAP-containing cleanup material applied;

(9) the number of gallons of each cleanup material employed;

(10) the total VOC emissions from all cleanup materials employed, in ton(s), i.e., the summation of the products of c)(7) times c)(9) for all the cleanup materials employed during the month, divided by 2000 pounds per ton;

(11) for each individual HAP,the total emissions from the cleanup materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of a)(8) times a)(9) for all the cleanup materials employed during the month, divided by 2,000 pounds per ton;

(12) the total VOC emission rate from the mixing operation and all the cleanup materials employed, in ton(s), i.e., c)(2) plus c)(10);

(13) for each individual HAP,the total emissions from the mixing operation and allthe cleanup materials employed, in ton(s), i.e., c)(5) plus c)(11) for each HAP.

*The VOC emission factor was developed by the company and described in a document entitled "Quantification of Emissions from Compound Mixing", revised December 16, 2003.

d) The permittee shall collect and record the following information each month for emissions unit P008:

(1) the number of vats dried;

(2) the number of vats wiped out with solvent;

(3) the number of drums dried;

(4) the total VOC emission rate, in ton(s), i.e., multiply the emission factor of 3.0 pounds of VOC per vat dried* by d)(1)plus 3.94 pound of VOC per vat wipe-cleaned* times d)(2) plus 0.72 pound of VOC per drum dried* times d)(3),divided by 2000 pounds per ton;

(5) for each individual HAP, the individual HAP to VOC ratio for each HAP for each solvent employed;

(6) for each individual HAP,the total uncontrolled emissions from all the solvents employed, in ton(s), i.e., for each HAP, the summation of the products of d)(4) times d)(5) for all the solvents employed during the month;

(7) the date and volume of each solvent addition to the vat cleaner, in gallons;

(8) the VOC content of each solvent added to the vat cleaner, in pounds of VOC per gallon;

(9) the date and volume of solvent mix removed from the vat cleaner, in gallons;

(10) the VOC content of each solvent removed from the vat cleaner, in pounds of VOC per gallon;

(11) the total VOC emission rate, in ton(s), i.e., the summation of the products of d)(7) times d)(8) for all the additions since the last removal minus d)(9) times d)(10) to obtain total VOC emissions, divided by 2000 pounds per ton, then divide by the number of months between the current and previous solvent removal). Note that the emissions will be calculated on a batch cycle basis and distributed evenly across the months that batch was in use;

(12) for each individual HAP, the individual HAP to VOC ratio for each HAP for each solvent mix employed;

(13) for each individual HAP,the total uncontrolled emissions from all the solvents employed, in ton(s), i.e., for each HAP, the summation of the products of d)(11) times d)(12) for all the solvents employed during the month;

(14) the total VOC emission rate from all solvents employed, in ton(s), i.e., d)(4) plus d)(11); and

(15) for each individual HAP,the total uncontrolled emissions from all solvents employed, in ton(s), i.e., for each individual HAP, d)(6) plus d)(13).

*The VOC emission factor was developed by the company and described in a document entitled "Quantification of Emissions from Vat Drying Process Emissions," revised 7/26/12.

e) The permittee shall collect and record the following information each month for the facility (emissions unitsK001, K003, K004, K005, K006, K009, P002, P008**,** P011**,** P012 and P014):

(1) the VOC emissions from all the materials employed, in ton(s) per month, i.e., the sum of all coating line emissions in 3.a)(9) plus 3.b)(5) plus 3.c)(12) plus 3.d)(14);

(2) for each HAP, the individual HAP emissions from all the materials employed, in ton(s) per month, i.e., 3.a)(10) plus 3.b)(6) plus 3.c)(13) plus 3.d)(15) plus X*/12;

(3) the total combined HAPs emissions from all the materials applied during the month, in ton(s) per month, i.e., the summation of all the individual HAP emissionscalculated in e)(2) above;

(4) the VOC emissions during the rolling 12-month period, i.e., the summation of all VOC emissions, as recorded in e)(1) above, for the present month plus the previous 11 months of operation, in ton(s);

(5) for each individual HAP, the calculated total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in e)(2) above, for the present month plus the previous 11 months of operation, in ton(s); and

(6) the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in e)(3) above, for the present month plus the previous 11 months of operation, in ton(s).

*X is the potential to emit for any individual HAP for the permit exempt and "De Minimis" sources.

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

4. The permittee shall submit quarterly deviation (excursion) reports that identify:

   a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

      (1) all exceedances of the rolling, 12-month emission limitation for VOC;

      (2) all exceedance of the rolling, 12-month emission limitation for any individual HAP; and

      (3) allexceedance of the rolling, 12-month emission limitation for combined HAPs.

   b) the probable cause of each deviation (excursion);

   c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

   d) the magnitude and duration of each deviation (excursion).

      If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

   The quarterly reports shall be submittedeach year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

5. Compliance with the emissions limitations in 2 above shall be determined in accordance with the following methods:

   a) Emissions Limitations:

      80.0 tons of VOC per year, based upon the rolling, 12-month summation of the monthly emissions

      8.0 tons of any individual HAP per year, based upon the rolling, 12-month summation of the monthly emissions

      20.0 tons of combined HAPs per year, based upon the rolling, 12-month summation of the monthly emissions

      Applicable Compliance Method:

      Compliance with the annual allowable VOC, individual HAP and combined HAPs emissions limitations above shall be demonstrated based upon the record keeping requirements established in 3.a), 3.b), 3.c), 3.d) and 3.e) above.

      Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings, thinners, additives, cleanup materials and any other materials containing VOC. Formulation

data shall be used to determine the HAP contents of the coatings, thinners, additives, cleanup materials and any other materials containing HAP.

C. Emissions Unit Terms and Conditions

1. P008, Vat Drying

Operations, Property and/or Equipment Description:

Vat Drying, Vat Wipe-Cleaning, Drum Liner Drying and Vat Cleaning

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)d. and g)(1).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c.

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.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The volatile organic compounds (VOC) emissions from this emissions unit shall not exceed 0.60 ton per month and 7.2 tons per year. See b)(2)(a) below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b. below.
c.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Major Nonattainment New Source Review and Title V permitting and to avoid being classified as a major source under 40 CFR Part 63, Subpart KK)	See 2, 3, 4 and 5 of Section B. Facility-Wide Terms and Conditions.
d.	OAC Chapter 3745-114	See g)(1) below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled VOCemissions associated with this air contaminant source since the uncontrolled potential to emit for VOC is less than ten tons per year.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) See Section B. Facility-Wide Terms and Conditions.

e) Reporting Requirements

(1) See Section B. Facility-Wide Terms and Conditions.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) 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 District Office or 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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:

The VOC from this emissions unit shall not exceed 0.60 ton per month and 7.2 tons per year.

Applicable Compliance Method:

Compliance with the monthly and annual allowable VOC emission limitations above shall be demonstrated through the record keeping requirements established in 3.d) of Section B. Facility-Wide Terms and Conditions.

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

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2. Emissions Unit Group -Coaters: K001,K003,K004,K005,

EU ID	Operations, Property and/or Equipment Description
K001	Reverse roll coater with optional in-line rotogravure station and a 4.5 MM Btu/hour natural gas fired oven (direct-fired, 3 burners) - 80 line coater.
K003	Reverse roll coater with optional in-line rotogravure station and a 6.0 MM Btu/hour natural gas fired oven (direct-fired, 4 burners) - 100 line coater.
K004	Reverse roll coater with optional in-line rotogravure station and a 6.0 MM Btu/hour natural gas fired oven (direct-fired, 4 burners) - 90 line coater.
K005	Quad roll coater with optional in-line rotogravure station and a 1.0 MM Btu/hour natural gas fired oven (direct-fired, 1 burner) - Rotary Screen.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b.

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.	OAC rule 3745-31-05(A)(3)	For emissions unit K001: The emissions of volatile organic compounds (VOC) shall not exceed 20.3 pounds per hour for coatings and 80.0 tons per year for coatings and cleanup materials. The capture equipment for emissions unit K001 shall achieve a capture efficiency which is at least 98.2 percent, by weight, for VOC. For emissions unit K003: The emissions

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		of VOC shall not exceed 16.25 pounds per hour for coatings and 71.2 tons per year for coatings and cleanup materials. The capture equipment for emissions unit K003 shall achieve a capture efficiency which is at least 92.2 percent, by weight, for VOC. For emissions unit K004: The emissions of VOC shall not exceed 24.53 pounds per hour for coatings and 80.0 tons per year for coatings and cleanup materials. The capture equipment for emissions unit K004 shall achieve a capture efficiency which is at least 98.5 percent, by weight, for VOC. For emissions unit K005: The emissions of VOC shall not exceed 7.83 pounds per hour for coatings and 34.3 tons per year for coatings and cleanup materials. The capture equipment for emissions unit K005 shall achieve a capture efficiency which is at least 95 percent, by weight, for VOC. For emissions unit K001, K003, K004 and K005 the thermal oxidizer shall achieve a control (destruction) efficiency which is at least 96 percent, by weight, for VOC. See b)(2)a. below.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Major Nonattainment New Source Review and Title V permitting and to avoid being classified as a major source under 40 CFR Part 63, Subpart KK)	See 2, 3, 4 and 5 of Section B. Facility-Wide Terms and Conditions. For emissions units K001, K003, K004 and K005, the overall control efficiency shall be at least 95 percent, by weight, for VOC.
c.	OAC rule 3745-21-07(M)(2)	For emissions unit K005, the emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3) and OAC rule

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		3745-31-05(D).
d.	OAC rule 3745-21-19(D)(2)	For emissions units K001, K003, K004 and K005, the emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3) and OAC rule 3745-31-05(D).
e.	OAC rule 3745-21-19(E)	For emissions unit K005, see c)(1) and c)(2) below.
f.	40 CFR Part 60, Subpart FFF	For emissions units K003, K004 and K005, the emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The temperature sensor is located in the combustion chamber at the exhaust outlet. This sensor location and monitoring, record keeping, and reporting requirements of OAC rule 3745-21-19 have been deemed to satisfy the monitoring, record keeping, and reporting requirements of 40 CFR Part 60, Subpart FFF except that the continuous monitoring device shall be calibrated annually and have an accuracy of ±0.75 percent of the temperature being measured, expressed in degrees Celsius, or ±2.5 ˚C, whichever is greater.

(2) Additional Terms and Conditions

a. The hourly VOC emission limitations were established to reflect the potential to emit for the emissions units listed above. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, line speed, the types and/or quantities of materials used or processed, or anything else that increases the potential emission of any air pollutant for the emissions units listed above, then the permittee shall apply for and obtain either a chapter 31 modification or an administrative modification to the Federally Enforceable Permit to Install and Operate (FEPTIO) prior to the change(s).

c) Operational Restrictions

(1) Flush cleaning operations.

The used cleaning solvent of any flush cleaning operation shall be emptied into an enclosed container or collection system that is kept closed when not in use or captured with wipers provided they comply with the housekeeping requirements of c)(2) below.

(2) Housekeeping measures for cleaning solvents and solvent-laden cleaning materials used in cleaning operations.

a. All fresh and spent cleaning solvents shall be stored in nonabsorbent, nonleaking containers that are kept closed at all times except when filling or emptying.

b. All used solvent-laden cloths and papers, and any other absorbent applicators used for cleaning, shall be placed in nonabsorbent, nonleaking containers or bags that are kept closed at all times except when depositing or removing these materials from the container or bag.

(3) The handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents shall be conducted in such a manner that minimizes spills.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall install, calibrate, maintain, and operate according to manufacturer's specifications, a temperature monitoring device equipped with a continuous recorder. The temperature monitoring device shall be located in the firebox or in the duct immediately downstream of the firebox in a position before any substantial heat exchange occurs.

(2) The permittee shall install, calibrate, maintain, and operate, according to manufacturer's specifications a pressure monitoring device equipped with a continuous recorder to measure pressure drop across the permanent total enclosure with an accuracy of at least 0.5 inch of water column or five per cent of the measured value, whichever is larger.

(3) While operating a VOC emission control system for controlling emissions from emissions units K001, K003, K004 and K005, the permittee shall not operate any capture or control device within the VOC emission control system at a three-hour block average value less than 1404 degree Fahrenheit or at a three-hour block average value less than the operating limits (operating parameter values) established during the most recent compliance test(s) that demonstrated compliance, except during periods of startup, shutdown and malfunction.

(4) The permittee shall inspect the VOC emission control system and monitoring equipment to assure that the VOC emission control system is operating properly, and that no leaks or malfunctions have occurred or are occurring. The inspections shall be made at the frequency defined by the equipment manufacturer, or as otherwise appropriate for each VOC emission control system and monitoring equipment, but not less than monthly.

(5) For any capture system that is part of a VOC emissions control and that contains bypass lines which could divert flow (i.e., VOC emissions) away from the control device to the atmosphere, the permittee shall for each bypass line employ a valve closure monitoring system that ensures any bypass line valve is in the closed (nondiverting) position through monitoring of valve position at least once every fifteen minutes. The permittee shall inspect the monitoring system at least once every month to verify that the monitor will indicate valve position.

(6) Establish the operating limit as follows:

a. Monitor and record the combustion temperature either in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs at least once every fifteen minutes during each of the three runs of the compliance test.

b. Calculate and record the average combustion temperature maintained during the compliance test. This average combustion temperature is the minimum operating limit for the thermal oxidizer.

(7) The pressure drop across the permanent total enclosure shall be at least 0.007 inch of water.

(8) The following types of records are to be maintained by the permittee of an aerospace manufacturing or rework facility subject to OAC rule 3745-21-19:

a. Compliance demonstration records for coating operations.

b. Compliance demonstration records for cleaning operations.

c. Monitoring records for VOC emission control systems.

(9) The permittee shall maintain the following records:

a. For each coating in use at the facility:

i. The name and VOC content as received and as applied.

ii. The type of coating, as identified in paragraphs (D)(1)(a) and (D)(1)(b) of OAC rule 3745-21-19.

iii. Where applicable, identification of the coating as designated for control pursuant to paragraph (D)(2) of OAC rule 3745-21-19 or exempted pursuant to paragraphs (D)(3)(a) to (D)(3)(e) of OAC rule 3745-21-19.

b. The amount (gallons) of each coating used each month at the facility.

c. For any coating operation controlled by a VOC emission control system:

i. identification of the coating line;

ii. documentation on the overall control efficiency of the VOC emission control system and the control efficiency of the thermal oxidizer within the VOC emission control system, including design estimates and the results of compliance tests conducted pursuant to paragraphs (F)(2), (F)(3), and (I) of OAC rule 3745-21-19; and

iii. for any coating that is controlled by the VOC emission control system, the name of the coating, the dates (or time periods) of control, and the amount (gallons) of such coating controlled each month.

(10) For any VOC emission control system, the permittee shall maintain monitoring records as follows for the thermal oxidizer:

a. continuous records of the firebox temperature;

b. records of all three-hour block averages of the firebox temperature during operation of the emissions unit;

c. a record of the operating limit established in d)(6) above; and

d. records of the times and durations of all periods during process or control operation when the monitoring device is not working.

(11) For the capture system bypass line that could divert flow (i.e., VOC emissions) away from the control device to the atmosphere, the permittee shall maintain the monitoring records specified below for the valve closure monitoring system:

a. hourly records of whether the monitoring device was operating and whether a diversion of flow (VOC emissions) to the atmosphere was detected at any time during the hour;

b. a record indicating that a monthly inspection of the monitoring device has been done; and

c. records of the times and durations of all periods when the monitoring device is not operating or flow (VOC emissions) is diverted to the atmosphere.

(12) For monthly (or more frequent) inspections of the VOC emission control system and monitoring equipment conducted pursuant to d)(4) above, a record of the results of each inspection.

(13) All records specified in d)(8) through d)(12) above shall be retained by the permittee for a period of not less than five years and shall be made available to the director or any authorized representative of the director for review during normal business hours.

e) Reporting Requirements

(1) The permittee shall submit semiannual compliance status reports no later than thirty calendar days after the end of each six-month period to the appropriate Ohio Environmental Protection Agency district office or local air agency. The first report shall be submitted no later than thirty calendar days after the end of the first six-month period

following the compliance date. Subsequent reports shall be submitted no later than thirty calendar days after the end of each six-month period following the first report or no later than thirty calendar days after the end of each six-month period otherwise established within a permit issued for the aerospace manufacturing or rework facility. For each semiannual compliance status report, the permittee shall submit the following information for the six-month period covered by the report:

a. For any VOC emission control system employed to met paragraph (D)(2) of OAC rule 3745-21-19, any changes to monitoring devices previously reported and required under paragraph (G) of OAC rule 3745-21-19.

b. If any subsequent compliance tests of the VOC emission control system are conducted during the semiannual reporting period after the initial compliance status report has been submitted, the semiannual compliance status report shallinclude the results of each compliance test, a complete test report, and the compliance test monitoring data as described under paragraphs (K)(2)(c)(iii) to (K)(2)(c)(v) of OAC rule 3745-21-19.

c. For cleaning operations subject to paragraph (E) of OAC rule 3745-21-19, the permittee shall submit in the semiannual compliance status report any changes to the previous reporting of the description of the types of cleaning operations and the listing of the cleaning solvents employed in each cleaning operation.

d. Compliance certification for semiannual reporting period.

The permittee shall submit with the semiannual compliance status report, the following compliance certifications, where applicable:

i. For any coating operation that is equipped with a VOC emission control system to comply with paragraph (D)(2) of OAC rule 3745-21-19:

(a) The compliance certification shall state that the three-hour block averages of the monitoring parameters recorded pursuant to paragraph (K)(5) of OAC rule 3745-21-15 had complied with the operating limits (operating parameter values) for the monitoring parameters established under paragraph (J)(2) of OAC rule 3745-21-15 during of all periods of operation of the coating operation in the semiannual reporting period; or should otherwise identify the times and durations of all periods of noncompliance and the reasons for noncompliance.

(b) The compliance certification shall identify the times and durations of all periods during coating operation or control operation when the monitoring device is not working, as recorded pursuant to paragraph (J)(4) of OAC rule 3745-21-19 and paragraph (K)(5) of rule 3745-21-15 of the Administrative Code.

(c) For any capture system bypass line, the compliance certification shall identify the times and durations of all periods in which the captured VOC emissions were discharged to atmosphere instead

of a control device, as recorded pursuant to paragraph (J)(4) of OAC rule 3745-21-19 and paragraph (K)(5)(f) of rule 3745-21-15 of the Administrative Code, and the reasons for the discharges to atmosphere.

(d) The compliance certification shall state that the overall reduction and control of VOC emissions, based on the most recent compliance test conducted in accordance with paragraph (I) of OAC rule 3745-21-19, has met the requirements under paragraph (D)(2) of OAC rule 3745-21-19 for each coating designated for control during the semiannual reporting period, or should otherwise identify the periods of noncompliance and the reasons for noncompliance.

ii. For cleaning operations subject to paragraph (E) of OAC rule 3745-21-19, the compliance certification shall identify for the semiannual reporting period:

(a) Any other instance of noncompliance with a requirement under paragraph (E) of OAC rule 3745-21-19; and

(b) If the cleaning operations have been in compliance for the semiannual reporting period, a statement that the cleaning operations have been in compliance with the applicable requirements.

iii. The compliance certification shall identify and describe any corrective actions considered and implemented for any noncompliance being reported in the compliance certification.

iv. The compliance certification shall be signed by the responsible official of a Title V facility, as defined in OAC rule 3745-77-01 or the signatory authority under OAC rule 3745-31-02 for a facility that is not Title V, that owns or operates the aerospace manufacturing or rework facility.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) 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 District Office or 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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:

For emissions unit K001: The emissions of VOC shall not exceed 20.3 pounds per hour for coatings.

For emissions unit K003: The emissions of VOC shall not exceed 16.25 pounds per hour for coatings.

For emissions unit K004: The emissions of VOC shall not exceed 24.53 pounds per hour for coatings.

For emissions unit K005: The emissions of VOC shall not exceed 7.83 pounds per hour for coatings.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitations above shall be demonstrated by multiplying the worst-case coating VOC content, in pounds of VOC per gallon of coating, by the maximum hourly usage rate, in gallons, times (1-0.95*).

*minimum overall control efficiency required by OAC rule 3745-31-05(D)

b. Emission Limitations:

For emissions unit K001: The emissions of VOC shall not exceed 80.0 tons per year for coatings and cleanup materials.

For emissions unit K003: The emissions of VOC shall not exceed 71.2 tons per year for coatings and cleanup materials.

For emissions unit K004: The emissions of VOC shall not exceed 80.0 tons per year for coatings and cleanup materials.

For emissions unit K005: The emissions of VOC shall not exceed 34.3 tons per year for coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitations above shall be demonstrated based upon the record keeping requirements established in 3.a) of Section B. Facility-Wide Terms and Conditions.

c. Emission Limitations:

The capture equipment for emissions unit K001 shall achieve a capture efficiency which is at least 98.2 percent, by weight, for VOC.

The capture equipment for emissions unit K003 shall achieve a capture efficiency which is at least 92.2 percent, by weight, for VOC.

The capture equipment for emissions unit K004 shall achieve a capture efficiency which is at least 98.5 percent, by weight, for VOC.

The capture equipment for emissions unit K005 shall achieve a capture efficiency which is at least 95 percent, by weight, for VOC.

For emissions units K001, K003, K004 and K005, the thermal oxidizer shall achieve a control (destruction) efficiency which is at least 96 percent, by weight, for VOC.

For emissions units K001, K003, K004 and K005, the overall control efficiency shall be at least 95 percent, by weight, for VOC.

Applicable Compliance Method:

Compliance with the control (destruction) efficiency, capture efficiency and overall control efficiency for VOC above shall be demonstrated based on the results of emissions testing conducted in accordance with f)(2) below.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing for the control efficiency was conducted on December 4, 2014.

b. The permanent total enclosures for emissions units K001, K003, K004 and K005 were verified on May 3, 2006 for emissions unit K001, March 16, 2011 for emissions unit K004 and May 2, 2006 for emissions units K004 and K005, resulting in the capture efficiency being 100%. As long as no changes to the permanent total enclosure have been made since the initial capture efficiency testing, retesting for the capture efficiency will not be required. If changes are made to the permanent total enclosure, then the capture efficiency shall be reevaluated as specified in c below.

c. If required, the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request,

including an evaluation of the applicability, necessity and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Compounding: P002,P011,P012,P014,

EU ID	Operations, Property and/or Equipment Description
P002	5 mixers for the blending of pigments into raw compounds for subsequent coating and printing operations (See g)(1) below.)
P011	Cowles Model 520VHV: 1167 lb/hr mixer - Mixer #1
P012	Cowles Model W-24-2: 1167 lb/hr mixer -- Mixer #6
P014	Cowles (Model # not available): 1167 lb/hr mixer -- Mixer #7

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)d. and g)(2).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c.

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.	OAC rule 3745-31-05(A)(3)	For emissions unit P002: For the Cowles #4 (1167 lbs/hr) mixer and the Morehouse Cowles #5 (1167 lbs/hr) mixer: The emissions of volatile organic compounds (VOC) for each mixer shall not exceed 4.16 pounds per hour and 18.22 tons per year. For Morehouse Cowles Coating Dept. (3500 lbs/hr) mixer: The emissions of VOC shall not exceed 7.39 pounds per hour and 32.37 tons per year.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a. below.
b.	ORC 3704.03(T)	For emissions units P011, P012 and P014: The emissions of VOC from each emissions unit shall not exceed 1.52 tons per month on a 12-month average. See b)(2)a. below.
c.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Major Nonattainment New Source Review and Title V permitting and to avoid being classified as a major source under 40 CFR Part 63, Subpart KK)	See 2, 3, 4 and 5 of Section B. Facility-Wide Terms and Conditions.
d.	OAC rule 3745-114	See g)(2) below.

(2) Additional Terms and Conditions

a. The hourly, monthly and annual VOC emission limitations are based on each mixer's or each emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) See Section B. Facility-Wide Terms and Conditions.

e) Reporting Requirements

(1) See Section B. Facility-Wide Terms and Conditions.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) 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 District Office or 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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:

For the Cowles #4 (1167 lbs/hr) mixer and the Morehouse Cowles #5 (1167 lbs/hr) mixer: The emissions of volatile organic compounds (VOC) for each mixer shall not exceed 4.16 pounds per hour and 18.22 tons per year.

For the Morehouse Cowles Coating Dept. (3500 lbs/hr) mixer: The emissions of VOC shall not exceed 7.39 pounds per hour and 32.37 tons per year.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitations for the Cowles #4 (1167 lbs/hr) mixer and the Morehouse Cowles #5 (1167 lbs/hr) mixer above shall be demonstrated by multiplying the VOC emission factor of 0.00356 pound of VOC per pound of material mixed* by the maximum amount of material mixed, in pounds per hour.

Compliance with the hourly allowable VOC emission limitation for the Morehouse Cowles Coating Dept. (3500 lbs/hr) mixer above shall be demonstrated by multiplying the VOC emission factor of 0.00211 pound of VOC per pound of material mixed* by the maximum amount of material mixed, in pounds per hour.

The annual allowable VOC emission limitations above were determined by multiplying the hourly allowable VOC emission limitations by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations is maintained, compliance with the annual allowable emission limitations shall be assumed.

*The VOC emission factor was developed by the company and described in a document entitled "Quantification of Emissions from Compound Mixing", revised December 16, 2003.

b. Emission Limitation:

For emissions units P011, P012 and P014: The emissions of VOC from each emissions unit shall not exceed 1.52 tons per month on a 12-month average.

Applicable Compliance Method:

Compliance with the monthly allowable VOC emission limitation shall be demonstrated bymultiplying the VOC emission factor of 0.00356 pound of VOC per pound of material mixed* by the maximum amount of material mixed, in pounds per hour times 8760 hours per year, and then dividing by 2000 pounds per ton and by 12 months per year.

*The VOC emission factor was developed by the company and described in a document entitled "Quantification of Emissions from Compound Mixing", revised December 16, 2003.

g) Miscellaneous Requirements

(1) Table 1. Compound Room Mixers

TAG #	Description	Installation Date
2	Myers (1167 lbs/hr) mixer	Prior to 1974
3	Cowles #3 (1167 lbs/hr) mixer	Prior to 1974
4	Cowles #4 (1167 lbs/hr) mixer	1989
5	Morehouse Cowles (1167 lbs/hr) mixer	2007
16	Morehouse Cowles Coating Dept. (3500 lbs/hr) mixer	2006

(2) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified Federally Enforceable Permit to Install and Operate (FEPTIO) prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

4. Emissions Unit Group -Silkscreen Printing: K006,K009,

EU ID	Operations, Property and/or Equipment Description
K006	Silkscreen printing machine with 0.75 MM Btu/hour natural gas fired oven (direct-fired, 1 burner) - Silkscreen.
K009	Silkscreen M & R Renegade LS Flatbed Press 62 x 148 with a 0.75 MM Btu/hour natural gas-fired oven (direct-fired, 1 burner) - Screen Print #2

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)g. and g)(1).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)e.

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.	OAC rule 3745-31-05(A)(3)	For emissions unit K006, the emissions of volatile organic compounds (VOC) shall not exceed 15.4 pounds per hour for coatings and 67.5 tons per year for coatings and cleanup materials. See b)(2)a. below.
b.	ORC 3704.03(T)	For emissions unit K009, the requirement established pursuant to this rule is equivalent to the requirement of OAC rule 3745-21-19(D)(1).
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The emissions from the natural gas-fired oven for emissions unit K009 shall not exceed the following: 0.1 pound of nitrogen oxides (NO_x) per

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		hour and 0.44 ton of NO_x per year; 0.1 pound of carbon monoxide (CO) per hour and 0.44 ton of CO per year; 0.001 pound of sulfur dioxide (SO_2) per hour and 0.004 ton of SO_2per year; and 0.01 pound of particulate emissions (PE) per hour and 0.04 ton of PE per year. See b)(2)b. and b)(2)d. below.
d.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	For emissions unit K009, see b)(2)c. below.
e.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Major Nonattainment New Source Review and Title V permitting and to avoid being classified as a major source under 40 CFR Part 63, Subpart KK)	See 2, 3, 4 and 5 of Section B. Facility-Wide Terms and Conditions.
f.	OAC rule 3745-21-19(D)(1)	Coatings applied in the coating operation shall not exceed 7.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
g.	OAC Chapter 3745-114	See g)(1) below.

(2) Additional Terms and Conditions

a. The hourly VOC emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.

However, if any proposed change(s), such as with production capacity, line speeds, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a chapter 31 modification or an administrative modification to the Federally Enforceable Permit to Install and Operate (FEPTIO) prior to the change(s).

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality

Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled NO_x, CO, PE and SO_2emissions from the natural gas-fired oven associated with this air contaminant source since the uncontrolled potentials to emit for NO_x, CO, PE and $SO_2$are each less than ten tons per year.

d. The hourly and annual NO_x, CO, PE and SO_2emission limitations are based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The VOC content of a coating shall be determined by the permittee in accordance with paragraph (B) of rule 3745-21-10 of the Administrative Code, wherein formulation data or U.S. EPA Method 24 procedures (which include various ASTM measurement methods) may be employed.

(2) The following types of records are to be maintained by the permittee of an aerospace manufacturing or rework facility subject to OAC rule 3745-21-19:

a. Compliance demonstration records for coating operations.

b. Compliance demonstration records for cleaning operations.

c. Monitoring records for VOC emission control systems.

(3) The permittee shall maintain the following records:

a. For each coating in use at the facility:

i. The name and VOC content as received and as applied.

ii. The type of coating, as identified in paragraphs (D)(1)(a) and (D)(1)(b) of OAC rule 3745-21-19.

iii. Where applicable, identification of the coating as designated for control pursuant to paragraph (D)(2) of OAC rule 3745-21-19 or exempted pursuant to paragraphs (D)(3)(a) to (D)(3)(e) of OAC rule 3745-21-19.

b. All data, calculations, and test results (including U.S. EPA Method 24 results) used in determining the VOC content of each coating, expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

c. The amount (gallons) of each coating used each month at the facility.

(4) All records specified in d)(2) and d)(3) above shall be retained by the permittee for a period of not less than five years and shall be made available to the director or any authorized representative of the director for review during normal business hours.

e) Reporting Requirements

(1) The permittee shall submit semiannual compliance status reports no later than thirty calendar days after the end of each six-month period to the appropriate Ohio Environmental Protection Agency district office or local air agency. The first report shall be submitted no later than thirty calendar days after the end of the first six-month period following the compliance date. Subsequent reports shall be submitted no later than thirty calendar days after the end of each six-month period following the first report or no later than thirty calendar days after the end of each six-month period otherwise established within a permit issued for the aerospace manufacturing or rework facility. For each semiannual compliance status report, the permittee shall submit the following information for the six-month period covered by the report:

a. For any coating operation subject to paragraph (D)(1) of OAC rule 3745-21-19, the permittee shall state in the semiannual compliance status report any changes to the previous reporting of the types of coatings and the VOC content limits for the coatings.

b. Compliance certification for semiannual reporting period.

The permittee shall submit with the semiannual compliance status report, the following compliance certifications, where applicable:

i. For any coating that is subject to a VOC content limit of paragraph (D)(1) of OAC rule 3745-21-19, the compliance certification shall state that only coatings which comply with the applicable VOC content limit have been used each operating day in the semiannual reporting period, or should otherwise identify the periods of use of coatings that did not comply, the reasons for such use of noncompliant coatings, and the amounts and VOC contents of each such noncompliant coating used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.

ii. The compliance certification shall identify and describe any corrective actions considered and implemented for any noncompliance being reported in the compliance certification.

iii. The compliance certification shall be signed by the responsible official of a Title V facility, as defined in OAC rule 3745-77-01 or the signatory authority under OAC rule 3745-31-02 for a facility that is not Title V, that owns or operates the aerospace manufacturing or rework facility.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) 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 District Office or 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 required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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 Limitation:

The emissions of VOC shall not exceed 15.4 pounds per hour for coatings.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated by multiplying the worst-case coating VOC content, in pounds of VOC per gallon of coating, by the maximum hourly usage rate, in gallons.

b. Emission Limitation:

The emissions of VOC shall not exceed 67.5 tons per year for coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based upon the record keeping requirements established in 3.b) of

Section B. Facility-Wide Terms and Conditions. As long as the combined emissions of VOC from emissions units K006 and K009 are below the annual allowable VOC emission limitation above, compliance with the annual allowable VOC emission limitation above for emissions unit K006 shall be demonstrated.

c. Emission Limitation:

Coatings applied in the coating operation shall not exceed 7.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated based upon the record keeping requirements established in d)(1) and d)(3) above.

d. Emission Limitation:

0.1 pound of NO_x per hour

Applicable Compliance Method:

Compliance with the hourly allowable NO_x emission limitation aboveshall be demonstrated by multiplying the NO_x emission factor of 100 pounds of NO_x emissions per million cubic feet of natural gas fired* by the maximum hourly natural gas usage.

*The NO_x emission factor is from AP-42, 5th edition, Table 1.4-1, dated 7/98

e. Emission Limitation:

0.1 pound of CO per hour

Applicable Compliance Method:

Compliance with the hourly allowable CO emission limitation aboveshall be demonstrated by multiplying the CO emission factor of 84 pounds of CO emissions per million cubic feet of natural gas fired* by the maximum hourly natural gas usage.

*The CO emission factor is from AP-42, 5th edition, Table 1.4-1, dated 7/98

f. Emission Limitation:

0.01 pound of PE per hour

Applicable Compliance Method:

Compliance with the hourly allowable PE limitationabove shall be demonstrated by multiplying the PE factor of 7.6 pounds of PE per million cubic feet of natural gas fired* by the maximum hourly natural gas usage.

*The PE factor is from AP-42, 5th edition, Table 1.4-2, dated 7/98

g. Emission Limitation:

0.001 pound of SO_2 per hour

Applicable Compliance Method:

Compliance with the hourly allowable SO_2 emission limitation aboveshall be demonstrated by multiplying the SO_2 emission factor of 0.6 pound of SO_2 emissions per million cubic feet of natural gas fired* by the maximum hourly natural gas usage.

*The SO_2 emission factor is from AP-42, 5th edition, Table 1.4-2, dated 7/98

h. Emission Limitations

0.44 ton of NO_x per year

0.44 ton of CO per year

0.04 ton of PE per year

0.004 ton of SO_2 per year

Applicable Compliance Method:

Compliance with the annual allowable emission limitations above shall be demonstrated by multiplying the hourly allowable emission limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitationsis maintained, compliance with the annual allowable emission limitations shall be demonstrated.

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.