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

3/6/2015

Certified Mail

Facility ID: 0660010006
Permit Number: P0089954
County: Muskingum

Mr. Matthew Montag
AK Steel - Zanesville Works
1724 Linden Avenue
Zanesville, OH 43701-2300

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is a finalOhio Environmental Protection Agency (EPA) Air Pollution Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it 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 Title V permit 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 regarding this permit, please contact the Ohio EPA DAPC, Southeast District Office as indicated on page one of your permit.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA DAPC, Southeast District Office

FINAL

Division of Air Pollution Control
Title V Permit
for
AK Steel - Zanesville Works

Facility ID:	0660010006
Permit Number:	P0089954
Permit Type:	Renewal
Issued:	3/6/2015
Effective:	3/27/2015
Expiration:	3/27/2020

Division of Air Pollution Control
Title V Permit
for
AK Steel - Zanesville Works

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Authorization

Facility ID:	0660010006
Facility Description:	Cleaning and coating steel coils.
Application Number(s):	A0021244, A0048296, A0049995, A0050969
Permit Number:	P0089954
Permit Description:	Title V renewal for a facility that cleans and coats steel coils.
Permit Type:	Renewal
Issue Date:	3/6/2015
Effective Date:	3/27/2015
Expiration Date:	3/27/2020
Superseded Permit Number:	P0089953

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

AK Steel - Zanesville Works
1724 Linden Avenue
Zanesville, OH 43701-2300

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

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Southeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Southeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Southeast District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from

federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Southeast District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

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

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Officialthat, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Southeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Southeast District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Southeast District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.

This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

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

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio EPA DAPC, Southeast District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention RequirementsUnder State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Southeast District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

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 ofan 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 Ohio EPA DAPC, Southeast District Office, 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 Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission limitation and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirement contained in a permit-to-install or the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

B010	No. 4 HP East Package Boiler
B011	No. 4 HP West Package Boiler
B012	No. 1 AP North Package Boiler
B013	No. 1 AP South Package Boiler
B014	No. 15 Coil Coater Package Boiler
B015	Misc. Natural Gas Combustion
F001	Plant Roadways & Parking Areas
L001	Cold Solvent Degreasers

   [Authority for term: OAC rule 3745-77-07(A)(13)]

3. Emissions units P010 and P011 contained in this permit are subject to 40 CFR Part 63, Subpart SSSS. The complete MACT requirements, including the MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulation (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

C. Emissions Unit Terms and Conditions

1. P001, #4 Hard Pickle Line

Operations, Property and/or Equipment Description:

No. 4 hard pickle and coating line with MgO payoff reel section, natural gas furnace section, and acid pickling section, with a fume scrubber on the pickling section and a baghouse on the payoff reel

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

(1) None.

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 3745-17-11(B)(1) (Figure II)	Particulate emissions (PE) from all stacks serving this emissions unit shall notexceed 7.6lbs/hr.
b.	OAC rule 3745-17-07(A)	Visible PE fromany stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) When the emissions unit is in operation, the emissions shall be controlled by the wet scrubber serving the pickle tub.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(2) When the emissions unit is in operation, the emissions shall be controlled by the baghouse serving the MgO payoff reel section.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the

stacksserving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

Note: The presence of water vapor in the scrubber plume does not constitute visible emissions

[Authority for term:OAC rules 3745-17-07(A)(1) and 3745-77-07(C)(1)]

(2) The permittee shall record all time periods during which the scrubber and/or baghouse was not in operation when the emissions unit was operating.

[Authority for term:OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

a. all days during which any visible particulate emissions were observed from the stacks serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term:OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all time periods during which the scrubber was not in operation when the emissions unit was operating; and

b. all time periods during which the baghouse was not in operation when the emissions unit was operating.

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

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:

PE from all stacks serving this emissions unit shall notexceed 7.6lbs/hr

Applicable Compliance Method:

Compliance with the hourly emission limitation is demonstrated based on the results of stack testing and by the following calculations based on information contained in permittee's application:

Multiply the maximum process rate of 6.4 tons/hr X 0.022 lb/ton (controlled stack emission factor for baghouse) = 0.14 lb/hr (controlled PE from baghouse)

Multiply the maximum process rate of 6.4 tons/hr X 0.125 lb/ton (stack emission factor for wet scrubber) = 0.8 lb/hr (controlled PE from wet scrubber)

Multiply heat input capacity of 6.7 mmBtu/hr/ 1,020 mmBtu/mmscf X 1.9 lbs/mmscf = 0.01 lb/hr (PE from natural gas combustion)

0.14 + 0.8 + 0.01 = 0.95 lb/hr

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

[Authority for term:OAC rules 3745-17-11(B)(1) and 3745-77-07(C)(1)]

b. Emission Limitation:

Visible PE limitation shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation above shall be determined in accordance with Test Method 9 of 40 CFR Part 60, Appendix A.

[Authority for term:OAC rules 3745-17-07(A) and 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

2. P003, #1 Sendzimir Mill

Operations, Property and/or Equipment Description:

No. 1 Sendzimir Mill controlled by two cyclones

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

(1) None.

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 3745-17-11(B) (Table I)	Particulate emissions (PE) from all stacks serving this emissions unit shall not exceed 42lbs/hr.
b.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term:OAC rules 3745-17-07(A)(1) and 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term:OAC rule 3745-77-07(C)(1)]

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. Emissions Limitation:

PE from all stacks serving this emissions unit shall not exceed 42lbs/hr

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation above shall be demonstrated based upon the results of stack testing conducted in accordance with test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745 17 03(B)(10). Alternative U.S. EPA-approved test

methods may be used with prior approval from Ohio EPA, Southeast District Office.

[Authority for term:OAC rules 3745-17-11(B)(1) and 3745-77-07(C)(1)]

b. Emissions Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation above shall be determined in accordance with Test Method 9 of 40 CFR Part 60, Appendix A.

[Authority for term:OAC rules 3745-17-07(A)(1) and 3745-77-07(C)(1)]

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

a. The emission testing shall be conducted within 6 months after the effective date of this Title V permit.

b. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: for PE, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

c. The permittee shall perform visible PE in accordance with 40 CFR Part 60, Appendix A, Method 9.

d. 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 agency.

e. 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).

f. 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.

g. 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.

[Authority for term:OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

3. P006, #6 Strip Anneal

Operations, Property and/or Equipment Description:

Natural gas-fired No. 6 strip anneal line

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

(1) None.

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 3745-17-11(B)	None. See Section b)(2)a. below.
b.	OAC rule 3745-17-07(A)	None. See Section b)(2)b. below.
c.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO_2) emissions shall not exceed 132 lbs/hr. See Section b)(2)c. below.

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(17), is equal to zero.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

c. No monitoring, record keeping, or reporting is necessary because the only source of SO_2 emissions is from the combustion of natural gas and the SO_2 emissions from the combustion of natural gas is considered negligible.

c) Operational Restrictions

(1) The permittee shall burn only natural gas as fuel in this emissions unit.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term:OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term:OAC rule 3745-77-07(C)(1)]

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. Emissions Limitation:

SO_2 emissions shall not exceed 132 lbs/hr

Applicable Compliance Method:

Compliance with the SO_2 emission limitation above is assumed since the only source of SO_2 emissions is from the combustion of natural gas and the SO_2 emissions from the combustion of natural gas is considered negligible.

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

[Authority for term:OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

4. P008, #1 Anneal and Pickle Line

Operations, Property and/or Equipment Description:

No. 1 Anneal Furnace and Pickle line vented to 2 packed tower wet scrubbers

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

(1) None.

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 established in PTI P0118137)	Particulate emissions (PE) shall not exceed 1.13 lbs/hr. Sulfur dioxide (SO_2) emissions shall not exceed 0.07 lb/hr and 0.31 TPY. Volatile organic compounds (VOC) emissions shall not exceed 0.65 lb/hr and 2.85 TPY. Nitrogen oxides (NO_x) emissions shall not exceed 84.82 lbs/hr. Carbon monoxide (CO) emissions shall not exceed 9.91 lbs/hr and 43.41 TPY. Hydrogen fluoride (HF) emissions shall not exceed 0.225 lb/hr and 0.63 TPY.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD)	Emissions shall not exceed the following as rolling, 12-month summations: NO_x: 258.35 tons; and PE:3.5 tons. See Sections b)(2)a. and c)(1) below.
c.	OAC rule 3745-17-11(B)	The emission limitation specified by this

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-18-06(E)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. When this emissions unit is in operation, the permittee shall employ low NO_x burners, the addition of urea to pickling baths, and a packed bed scrubber to control NO_x emissions.

c) Operational Restrictions

(1) The maximum annual production rate for this emissions unit shall not exceed 251,000 tons, based upon a rolling, 12-month summation of the production rates.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the acid fume scrubber (Heil Process Co.) that must be maintained in order to demonstrate compliance shall not be less than 2 inches of water while the emissions unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the kolene scrubber (Enviroclear) that must be maintained in order to demonstrate compliance shall not be less than 1 inch of water while the emissions unit is in operation.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

(3) The permittee shall maintain the urea feed rate for each product type produced in this emissions unit at an average hourly rate that is not less than the urea feed rate established during the most recent emission tests that demonstrated this emissions unit was in compliance with the hourly allowable NO_x emission limitation of 84.82 lbs/hr.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

(4) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across each scrubber (in inches of water) during operation of this/these emissions unit(s), including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubbers on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date the corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the pressure drop and flow rate readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

These range(s) and/or limit(s) for the pressure drop are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the pressure drop based upon information obtained during future performance tests that demonstrate compliance with the allowable particulate emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term:OAC rule 3745-77-07(C)(1)]

(5) The permittee shall maintain monthly records of the following information:

a. the production rate, in tons;

b. the number of hours of operation;

c. the average hourly production rate, in tons/hour;

d. the total amount of natural gas employed by the emissions unit, in mmscf;

e. the average hourly natural gas usage, calculated as follows:

mmscf/hr = the total amount of natural gas employed, in mmscf / the total hours of operation; and

f. the rolling, 12-month summation of the production rates, in tons..

[Authority for term:OAC rule 3745-77-07(C)(1)]

(6) The permittee shall maintain records of the following information for each run of each product type produced in this emissions unit:

a. the total amount of urea employed, in gallons;

b. the hours of operation for the product type run; and

c. the average hourly urea feed rate, in gallons/hour.

[Authority for term:OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubbers were outside of the appropriate range or exceeded the applicable limit contained in this permit;

b. each period of time (start time and date, and end time and date) when the urea feed rate was outside of the acceptable range following any required compliance demonstration;

c. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;

d. each incident of deviation described in “a”, “b” or “c” (above) where a prompt investigation was not conducted;

e. each incident of deviation described in “a”, “b” or “c” where prompt corrective action, that would bring the pressure drop and/or liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and

f. each incident of deviation described in “a”, “b” or “c” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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

[Authority for term:OAC rule 3745-77-07(C)(1)]

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. Emissions Limitation:

PE shall not exceed 1.13 lbs/hr.

Applicable Compliance Method:

Compliance with the hourly PE limitation above shall be determined based on summing the hourly PE from the natural gas annealing furnace and the pickling and kolene process as follows:

Annealing furnace PE rateis calculated by multiplying the emission factor from AP-42, Table 1.4-2, 7/98 (1.9 lbs/mmscf) by the annealing furnace maximum fuel usage (0.118 mmscf/hr).

Pickling and kolenePE rateis calculated by multiplying the stack test- derived emission factor of 0.02 lb PE/ton metal (submitted by the permittee in PTI 06-04694 application) by the maximum process weight rate of P008 (45 ton metal/hr).

Total allowable emissions = 0.22lb/hr + 0.9 lb/hr = 1.13 lb PE/hr

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

b. Emissions Limitation:

PE shall not exceed 3.5 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual PE limitation above shall be determined based on summing the annual PE from the natural gas annealing furnace and the pickling and kolene process as follows:

Annealing furnace PE rate is calculated by multiplying the short term emissions of 0.225 lb/hr by the rolling, 12-month summation of the hours of operation, and then dividing by 2,000 lbs/ton.

Pickling and kolenePE rate is calculated by multiplying the stack test-derived emission factor of 0.02 lb PE/ton metal (submitted by the permittee in PTI 06-04694 application) by the total tons of metal produced during each rolling, 12-month period, and then dividing by 2,000 lbs/ton.

Total allowable emissions = 0.99 tons + 2.51 tons = 3.5 tons

c. Emissions Limitations:

SO_2 emissions shall not exceed 0.07 lb/hrand 0.31 TPY.

Applicable Compliance Method:

Compliance with the hourly SO_2 emission limitation shall be determined by multiplying the emission factor from AP-42, Table 1.4-2, 7/98 (0.6 lbs SO_2/mmscf) by the annealing furnace maximum fuel usage (0.118 mmscf/hr).

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The annual SO_2 emission limitation was determined by multiplying the allowable hourly SO_2 emission limitation by the annual hours of operation, and then dividing by 2,000 lbs/ton. Therefore, as long as compliance with the hourly SO_2 emission limitation is maintained, compliance with the annual SO_2 emission limitation shall be demonstrated.

d. Emissions Limitations:

VOC emissions shall not exceed 0.65 lb/hr and 2.85 TPY.

Applicable Compliance Method:

Compliance with the hourly VOC emission limitation shall be determined by multiplying the emission factor from AP-42, Table 1.4-2, 7/98 (5.5 lbs VOC/mmscf) by the annealing furnace maximum fuel usage (0.118 mmscf/hr).

If required, organic compound emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The annual VOC emission limitation was determined by multiplying the allowable hourly VOC emission limitation by the annual hours of operation, and then dividing by 2,000 lbs/ton. Therefore, as long as compliance with the hourly VOC emission limitation is maintain, compliance with the annual VOC emission limitation shall be demonstrated.

e. Emissions Limitation:

NO_x emissions shall not exceed 84.82 lbs/hr.

Applicable Compliance Method:

Compliance with the hourly NO_x emission limitation above shall be determined by summing of the NO_x emissions from the natural gas annealing furnace and the pickling and kolene process as follows:

Annealing furnace NO_x emissions are calculated by multiplying the manufacturer-supplied emission factor of 0.108 lb NO_x/million Btu by the maximum rated capacity of the annealing furnace, 127 million Btu/hr.

Pickling and kolene NO_x emissions are calculated by multiplying the 1995 stack test-derived emission factor of 1.58 lb NO_x/ton metal by the maximum process weight rate of P008, 45 ton metal/hr.

Total allowable emissions = 13.72lbs/hr + 71.1 lbs/hr = 84.82 lbs NO_x/hr

Nitrogen oxides emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

f. Emissions Limitation:

NO_x emissions shall not exceed 258.35 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual NO_x emission limitation shall be determined by summing the rolling, 12-month NO_x emissions from the natural gas annealing furnace and the pickling and kolene process as follows:

Annealing furnace NO_x emissions are calculated by multiplying the short term emissions of 13.72 lb/hr by the 12-month, 12-month summation of the hours of operation, and then dividing by 2,000 lbs/ton.

Pickling and kolene NO_x emissions are calculated by multiplying the stack test-derived emission factor of 1.58 lb NO_x/ton metal (submitted by the permittee in PTI 06-04694 application) by the total tons of metal produced during each rolling, 12-month period, and then dividing by 2,000 lbs/ton.

Total allowable emissions = 60.09 tons + 198.29 tons = 258.35 tons

g. Emissions Limitations:

CO emissions shall not exceed 9.91 lbs/hrand 43.41 TPY.

Applicable Compliance Method:

Compliance with the hourly CO emission limitation shall be determined by multiplying the emission factor from AP-42, Table 1.4-1, 7/98 (84 lbs CO/mmscf) by the annealing furnace maximum fuel usage (0.118 mmscf/hr).

If required, compliance with the hourly allowable CO emissions limitation shall be determined based on the results of stack testing conducted in accordance with test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The annual CO emission limitation was determined was determined by multiplying the allowable hourly CO emission limitation by the annual hours of operation, and then dividing by 2,000 lbs/ton. Therefore, as long as compliance with the hourly CO emissions limitation is maintained, compliance with the annual CO emissions limitation shall be demonstrated.

h. Emissions Limitations:

HF emissions shall not exceed 0.225 lb/hrand 0.63 TPY.

Applicable Compliance Method:

Compliance with the hourly HF emissions above shall be demonstrated by multiplying the 1995 stack test-derived emission factor of 0.005 lb HF/ton by the maximum process weight rate for this emissions unit (45 tons metal/hr).

If required, hydrogen fluoride emissions shall be determined according to test Method 26A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The annual HF emissions was determined by multiplying the stack test-derived emission factor of 0.005 lb HF/ton metal (submitted by the permittee in PTI 06-04694 application) by the restriction on the total tons of metal produced of 250,000, and then dividing by 2,000 lbs/ton. Therefore, as long as compliance with the annual restriction on the metal produced is maintained, compliance with the annual HF emissions shall be demonstrated.

i. Emissions Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation above shall be determined in accordance with Test Method 9 of 40 CFR, Part 60, Appendix A.

[Authority for term:OAC rule 3745-77-07(C)(1)]

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

a. The emission testing shall be conducted within 6 months after the effective date for this Title V permit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for NO_x.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for NO_x: Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A.

d. The permittee shall record the total amount of urea employed and the average hourly urea feed rate during each emission test run for each type of product produced.

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 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.

[Authority for term:OAC rule 3745-77-07(C)(1)]

(3) As new product types are developed for production in this emissions unit, the permittee shall conduct emission tests for each new product typein accordance with the procedure specified in section f)(2). Such emission tests shall be performed within 90 days of when routine production of the new product type begins.

[Authority for term:OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

5. P009, #2 Strip Anneal and Coating Line

Operations, Property and/or Equipment Description:

No. 2 Strip Anneal Furnaceand Coating Line

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

(1) None.

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 3745-17-11(B)	None. See Section b)(2)a. below.
b.	OAC rule 3745-17-07(A)	None. See Section b)(2)b. below.
c.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO_2) emissions shall not exceed 140.3lbs/hr. See Section b)(2)e. below.

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

c. No monitoring, record keeping, or reporting is necessary because the only source of SO_2 emissions is from the combustion of natural gas and the SO_2 emissions from the combustion of natural gas is considered negligible.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

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. Emissions Limitation:

SO_2 emissions shall not exceed 140.3lbs/hr

Applicable Compliance Method:

Compliance with the SO_2 emission limitation above is assumed since the only source of SO_2 emissions is from the combustion of natural gas and the SO_2 emissions from the combustion of natural gas is considered negligible.

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

[Authority for term:OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

6. P010, #7 Coil Coating Line

Operations, Property and/or Equipment Description:

No. 7 Coating line with drying furnace

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

(1) None.

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 3745-17-07(A)	See Section b)(2)a. below.
b.	OAC rule 3745-17-11(B)	See Section b)(2)b. below.
c.	OAC rule 3745-21-09(E)	The VOC content of the coatings employed shall not exceed 2.6 pounds of VOC per gallon (lbs/gal) of coating, excluding water and exempt solvents. See Section b)(2)c. below.
d.	40 CFR Part 63, Subpart SSSS (40 CFR 63.5080-5209) [In accordance with 40 CFR 63.5090(a), this emissions unit is an existing metal coil surface coating source at a stationary source that was a major source of HAP emissions and is subject to the emissions limitations and control measures specified in this section.]	Limit organic HAP emissions to the level specified in (1), (2), or (3) below: (1) Organic HAP emissions shall not exceed more than 2 percent of the organic HAP applied during each rolling, 12-month compliance period (Compliance Options 3, or 4); (2) OrganicHAPemissionsshallnotexceed 0.046kg/literofsolids (0.38lbs/gallon ofsolids)appliedduringeachrolling,12-monthcomplianceperiod (Compliance Options 1, 2, or 4); or (3) If an oxidizer is used to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		on a dry basis is achieved and the efficiency of the capture system is 100 percent (Compliance Option 3 or 4). See Section b)(2)d. and b)(2)e. below for Compliance Options 1, 2, 3, and 4.
e.	40 CFR Part 63, Subpart A (40 CFR 63.5140)	Table 2 of 40 CFR Part 63, Subpart SSSS – Applicability of General Provisions (Subpart A) to Subpart SSSS shows which parts of the General provisions in 40 CFR Part 63.1-19 that apply.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

b. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

c. The permittee is complying with this rule by ensuring that each coating employed complies with the VOC content limitation.

d. The permittee shall comply with the emission standards of 40 CFR Part 63, Subpart SSSS through use of one of the following compliance options:

Compliance Option	Citation	Requirement(s)
Option 1	40 CFR 63.5170, Table 1	Use of "as purchased" compliant coatings per 40 CFR Part 63.5170(a).
Option 2	40 CFR 63.5170, Table 1	Use of "as applied" compliant coatings per 40 CFR Part 63.5170(b)(1) or (b)(2).
Option 3	40 CFR 63.5170, Table 1	Use of a capture system and control device per 40 CFR Part 63.5170(c).

Compliance Option	Citation	Requirement(s)
Option 4	40 CFR 63.5170, Table 1	Use of a combination of compliant coatings and control devices and maintaining an acceptable equivalent emission rate per 40 CFR Part 63.5170(d).

e. The permittee shall comply with the applicable requirements under 40 CFR Part 63, Subpart SSSS, including the following sections:

Options 1 & 2	40 CFR 63.5140(a)	If you are complying with the emission standards of this subpart without the use of a capture system and control device, you must be in compliance with the standards at all times, including periods of start-up, shutdown, and malfunction.
Options 3 & 4	40 CFR 63.5140(a)	Compliance with standards of this subpart required at all times, except during periods of start-up shutdown, and malfunction of capture systems or control devices used to comply with this subpart.
All	40 CFR 63.5170	Any of the compliance options may be applied to an individual coil coating line, or to multiple lines as a group, or to the entire affected source. Different compliance options may be used for different coil coating lines, or at different times on the same line. However, different compliance options may not be used at the same time on the same coil coating line.
All	40 CFR 63.5140(b)	Applicable requirements of the General Provisions in 40 CFR Part 63, Subpart A.

c) Operational Restrictions

(1) The permittee shall comply with the applicable work practice standards required pursuant to 40 CFR Part 63, Subpart SSSS:

Option	Citation	Requirement
Options 3 & 4	40 CFR 63.5121(a)	Operating limits in Table 1 for add-on control devices used for a coil coating line, except for solvent recovery devices where a liquid-liquid material balance is conducted according to 40 CFR Part 63.5170(e)(1).
Options 3 & 4	40 CFR 63.5121(b)	For use of an add-on control device not listed in Table 1 or the use of an alternative monitoring parameter to show compliance, the permittee must apply to the Administrator for approval of alternative monitoring under 40 CFR 63.8(f).

[Authorityforterm: 40 CFR 63.5121(a), 40 CFR 63.5121(b) and 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the line:

a. the name and identification number of each coating, as applied; and

b. the VOC content of each coating (in lbs/gallon, excluding water and exempt solvents), as applied.

[Authority for term:OAC rule 3745-77-07(C)(1)]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements pursuant to 40 CFR Part 63, Subpart SSSS:

Option	Citation	Requirement
Options 3 & 4	40 CFR 63.5150(a)(1)-(4)	Monitoring requirements for control devices, capture systems, intermittently controllable work stations, and continuous emission monitors.
All	40 CFR 63.5190(a)(1)	Maintain records of the coating lines on which each compliance option is used and the time periods (beginning and ending dates and times) for which each option is used.
Options 3 & 4	40 CFR 63.5190(a)(2)(i)	Maintain records of continuous emission monitoring data in accordance with 40 CFR Part 63.5150(a)(2).

Option	Citation	Requirement
Options 3 & 4	40 CFR 63.5190(a)(2)(ii)	Maintain records of control device and capture operating parameter data in accordance with 40 CFR Part 63.5150(a)(1), (3), and (4).
Options 1, 2, & 4	40 CFR 63.5190(a)(2)(iii)	Maintain records of organic HAP content data for the purpose of demonstrating compliance in accordance with 40 CFR Part 63.5160(b).
Options 1, 2, & 4	40 CFR 63.5190(a)(2)(iv)	Maintain records of volatile matter and solids content data for the purpose of demonstrating compliance in accordance with 40 CFR Part 63.5160(c).
Options 3 & 4	40 CFR 63.5190(a)(2)(v)	Maintain records of the overall control efficiency determination or alternative outlet HAP concentration in accordance with 40 CFR Part 63.5160(d), (e), and (f).
Options 1, 2, & 4	40 CFR 63.5190(a)(2)(vi)	Maintain records of material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with 40 CFR Part 63.5170(a), (b), and (d).
Options 3 & 4	40 CFR 63.5190(b)	Maintain records of all liquid-liquid material balances that are performed in accordance with the requirements of 40 CFR Part 63.5170.

[Authority for term:OAC rule 3745-77-07(C)(1), 40 CFR 63.1510, and 40 CFR 63.5190]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of non-complying coatings (with OAC rule 374521-09(E)). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[Authority for term:OAC rule 3745-77-07(C)(1)]

(2) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart SSSS:

Option	Citation	Requirement
Options 3 & 4	40 CFR 63.5180(c)	Notification of performance testing
Options 3 & 4	40 CFR 63.5180(e)	Performance test reports
Options 3 & 4	40 CFR 63.5180(f)	Start-up, shutdown, and malfunction reports
All	40 CFR 63.5180(g)-(i)	Semi-annual compliance report

[Authority for term:OAC rule 3745-77-07(C)(1) and 40 CFR 63.5180]

f) Testing Requirements

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

a. Emissions Limitation:

The VOC content of the coatings employed shall not exceed 2.6 pounds of VOC per gallon (lbs/gal) of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC emission limitation above shall be demonstrated based upon the record keeping requirements specified in section d)(1) of this permit. USEPA Method 24 shall be used to determine the VOC contents of the coatings.

b. Emissions Limitation:

Limit organic HAP emissions to the level specified in (1), (2), or (3) below organic HAP emissions shall not exceed more than 2 percent of the organic HAP applied during each rolling, 12-month compliance period;

Organic HAP emissions shall not exceed 0.046 kg/liter of solids (0.38 lbs/gallon of solids) applied during each rolling, 12-month compliance period; or

If an oxidizer is used to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 percent.

Applicable Compliance Method:

Compliancewiththe organic HAP emissionlimitations above shall bedeterminedthroughtherecordkeepingrequirementsestablishedin sections d) of the permit.

[Authority for term:OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart SSSS]

(2) The permittee shall conduct emission testing for this emissions unit in accordance with the requirements of 40 CFR Part 63, Subpart SSSS:

Option	Citation	Requirement
Options 1, 2, & 4	40 CFR 63.5160, Table 1	Determine the HAP or volatile matter and solids content of coating materials according to the procedures in 40 CFR Part 63.5160(b) and (c).
Options 3 & 4	40 CFR 63.5160, Table 1	Conduct a performance test for each capture and control system to determine: (1) the destruction or removal efficiency of each control device according to 63.5160(d), and (2) the capture efficiency of each capture system according to 40 CFR Part 63.5160(e).
Options 3 & 4	40 CFR 63.5160(a)	Performance test exemption criteria

[Authority for term:OAC rule 3745-77-07(C)(1),40 CF 63.5160 and 40 CFR 63.5170]

g) Miscellaneous Requirements

(1) None.

7. P011, #15 Coating Line

Operations, Property and/or Equipment Description:

No. 15 Coating line with drying furnace anda dust collector that vents the entry end coil payoff.

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

(1) None.

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 established in PTI P0118139)	Particulate emissions (PE) shall not exceed 0.025 grain per dry standard cubic foot (equivalent to 2.6 pounds per hour at maximum air flow rate) of exhaust gases or there shall be no visible PE, whichever is less stringent. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-08(B)(3). PE from the coating line dust collector shall not exceed 9.4 tons per year.
b.	OAC rule 3745-17-07(A)	See Section b)(2)a. below.
c.	OAC rule 3745-17-11(B)	See Section b)(2)b. below.
d.	OAC rule 3745-21-09(E)	The VOC content of the coatings employed shall not exceed 2.6 pounds of VOC per gallon (lbs/gal) of coating, excluding water and exempt solvents. See Section b)(2)c. below.
e.	OAC rule 3745-17-08(B)(3)	See Section b)(2)d. below.
f.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.
g.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO_2) emissions shall not exceed 120.8lbs/hr.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See Section b)(2)e. below.
h.	40 CFR Part 63, Subpart SSSS (40 CFR 63.5080-5209) [In accordance with 40 CFR 63.5090(a), this emissions unit is an existing metal coil surface coating source at a stationary source that was a major source of HAP emissions and is subject to the emissions limitations and control measures specified in this section.]	Limit organic HAP emissions to the level specified in (1), (2), or (3) below: (1) Organic HAP emissions shall not exceed more than 2 percent of the organic HAP applied during each rolling, 12-month compliance period (Compliance Options 3, or 4); (2) Organic HAP emissions shall not exceed 0.046 kg/liter of solids (0.38 lb/gallon of solids) applied during each rolling 12-month compliance period (Compliance Options 1, 2, or 4); or (3) If an oxidizer is used to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 percent (Compliance Options 3 or 4). See Section b)(2)f. and b)(2)g. below for Compliance Options 1, 2, 3, and 4.
i.	40 CFR Part 63, Subpart A (40 CFR 63.5140)	Table 2 of 40 CFR Part 63, Subpart SSSS – Applicability of General Provisions (Subpart A) to Subpart SSSS shows which parts of the General provisions in 40 CFR Part 63.1-19 apply.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

b. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

c. The permittee is complying with this rule by ensuring that each coating employed complies with the VOC content limitation.

d. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:

i. the installation and use of hoods, fan, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust to the baghouse; and

ii. a collection efficiency that is sufficient to minimize or eliminate visible particulate PE of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

e. No monitoring, record keeping, or reporting is necessary because the only source of SO_2 emissions is from the combustion of natural gas and the SO_2 emissions from the combustion of natural gas is considered negligible.

f. The permittee shall comply with the emission standards of 40 CFR Part 63, Subpart SSSS through use of one of the following compliance options:

Compliance Option	Citation	Requirement(s)
Option 1	40 CFR 63.5170, Table 1	Use of "as purchased" compliant coatings per 40 CFR Part 63.5170(a).
Option 2	40 CFR 63.5170, Table 1	Use of "as applied" compliant coatings per 40 CFR Part 63.5170(b)(1) or (b)(2).
Option 3	40 CFR 63.5170, Table 1	Use of a capture system and control device per 40 CFR Part 63.5170(c).
Option 4	40 CFR 63.5170, Table 1	Use of a combination of compliant coatings and control devices and maintaining an acceptable equivalent emission rate per 40 CFR Part 63.5170(d).

g. The permittee shall comply with the applicable requirements under 40 CFR Part 63, Subpart SSSS, including the following sections:

Options 1 & 2	40 CFR 63.5140(a)	If you are complying with the emission standards of this subpart without the use of a capture system and control device, you must be in compliance with the standards at all times, including periods of start-up, shutdown, and malfunction.

Options 3 & 4	40 CFR 63.5140(a)	Compliance with standards of this subpart required at all times, except during periods of start-up shutdown, and malfunction of capture systems or control devices used to comply with this subpart.
All	40 CFR 63.5170	Any of the compliance options may be applied to an individual coil coating line, or to multiple lines as a group, or to the entire affected source. Different compliance options may be used for different coil coating lines, or at different times on the same line. However, different compliance options may not be used at the same time on the same coil coating line.
All	40 CFR 63.5140(b)	Applicable requirements of the General Provisions in 40 CFR Part 63, Subpart A.

c) Operational Restrictions

(1) The permittee shall comply with the applicable work practice standards required pursuant to 40 CFR Part 63, Subpart SSSS:

Option	Citation	Requirement
Options 3 & 4	40 CFR 63.5121(a)	Operating limits in Table 1 for add-on control devices used for a coil coating line, except for solvent recovery devices where a liquid-liquid material balance is conducted according to 40 CFR Part 63.5170(e)(1).
Options 3 & 4	40 CFR 63.5121(b)	For use of an add-on control device not listed in Table 1 or the use of an alternative monitoring parameter to show compliance, the permittee must apply to the Administrator for approval of alternative monitoring under 40 CFR 63.8(f).

[Authorityforterm: 40 CFR 63.5121(a), 40 CFR 63.5121(b) and 3745-77-07(A)(1)]

(2) When a coil is uncoiled in preparation for coating in this emissions unit, the vacuum system and the baghouse shall be employed. Exhaust from the baghouse serving this emissions unit is currently vented into the building. This is the normal operating mode for this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.05 to 4.0kPa of water.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in kilopascals, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit,the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the pressure drop readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of aminor permit modification.

[Authority for term:OAC rule 3745-77-07(C)(1)]

(3) The permittee shall collect and record the following information each month for the line:

a. the name and identification number of each coating, as applied; and

b. the VOC content of each coating (excluding water and exempt solvents), as applied.

[Authority for term:OAC rule 3745-77-07(C)(1)]

(4) The permittee shall comply with the applicable monitoring and record keeping requirements pursuant to 40 CFR Part 63, Subpart SSSS:

Option	Citation	Requirement
Options 3 & 4	40 CFR 63.5150(a)(1)-(4)	Monitoring requirements for control devices, capture systems, intermittently controllable work stations, and continuous emission monitors.
All	40 CFR 63.5190(a)(1)	Maintain records of the coating lines on which each compliance option is used and the time periods (beginning and ending dates and times) for which each option is used.
Options 3 & 4	40 CFR 63.5190(a)(2)(i)	Maintain records of continuous emission monitoring data in accordance with 40 CFR Part 63.5150(a)(2).
Options 3 & 4	40 CFR 63.5190(a)(2)(ii)	Maintain records of control device and capture operating parameter data in accordance with 40 CFR Part 63.5150(a)(1), (3), and (4).

Option	Citation	Requirement
Options 1, 2, & 4	40 CFR 63.5190(a)(2)(iii)	Maintain records of organic HAP content data for the purpose of demonstrating compliance in accordance with 40 CFR Part 63.5160(b).
Options 1, 2, & 4	40 CFR 63.5190(a)(2)(iv)	Maintain records of volatile matter and solids content data for the purpose of demonstrating compliance in accordance with 40 CFR Part 63.5160(c).
Options 3 & 4	40 CFR 63.5190(a)(2)(v)	Maintain records of the overall control efficiency determination or alternative outlet HAP concentration in accordance with 40 CFR Part 63.5160(d), (e), and (f).
Options 1, 2, & 4	40 CFR 63.5190(a)(2)(vi)	Maintain records of material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with 40 CFR Part 63.5170(a), (b), and (d).
Options 3 & 4	40 CFR 63.5190(b)	Maintain records of all liquid-liquid material balances that are performed in accordance with the requirements of 40 CFR Part 63.5170.

[Authority for term:OAC rule 3745-77-07(C)(1), 40 CFR 63.1510, and 40 CFR 63.5190]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date)when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s),as identified in the monitoring and record keeping requirements of this permit.

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

[Authority for term:OAC rule 3745-77-07(C)(1)]

(2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of non-complying coatings (with OAC rule 3745-21-09E). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[Authority for term:OAC rule 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable reporting requirements pursuant to 40 CFR Part 63, Subpart SSSS:

Option	Citation	Requirement
Options 3 & 4	40 CFR 63.5180(c)	Notification of performance testing
Options 3 & 4	40 CFR 63.5180(e)	Performance test reports
Options 3 & 4	40 CFR 63.5180(f)	Start-up, shutdown, and malfunction reports
All	40 CFR 63.5180(g)-(i)	Semi-annual compliance report

[Authority for term:OAC rule 3745-77-07(C)(1) and 40 CFR 63.5180]

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. Emissions Limitation:

PE shall not exceed 0.025 grain per dry standard cubic foot or no visible PE from the exhaust of the dust collector.

Applicable Compliance Method:

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" and/or USEPA Method 22, and the procedures specified in OAC rule 3745-17-03(B)(7).

b. Emissions Limitation:

PE from the coating line dust collector shall not exceed 9.4 tons per year.

Applicable Compliance Method:

The annual PE limitation of 9.4 tons per year was determined in accordance with the following equation:

tons PE/year = (0.025 gr/dscf) X (10,000 dscf/min) X (lb/7000 gr) X (60 min/hour) X (ton/2000 lbs) X (actual hours of operation/year)

[The flow rate of 10,000 dscf/min represents the maximum flow rate of the exhaust gases from the control equipment, based on company data.]

Therefore, as long as compliance with the 0.025 gr/dscf is maintained, compliance with the annual PE limitation shall be demonstrated.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

c. Emissions Limitation:

The VOC content of the coatings employed shall not exceed 2.6 pounds of VOC per gallon (lbs/gal) of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC emission limitation above shall be demonstrated based upon the record keeping requirement specified in section d)(3).

[Authority for Term: OAC rule 3745-77-07(C)(1)]

d. Emissions Limitation:

Visible emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance with the visible PE limitation above shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3).

[Authority for term:OAC rule 3745-77-07(C)(1)]

e. Emissions Limitation:

SO_2 emissions shall not exceed 120.8lbs/hr

Applicable Compliance Method:

Compliance with the SO_2 emission limitation above is assumed since the only source of SO_2 emissions is from the combustion of natural gas and the SO_2 emissions from the combustion of natural gas is considered negligible.

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

[Authority for term:OAC rule 3745-77-07(C)(1)]

f. Emissions Limitations:

Limit organic HAP emissions to the level specified in (1), (2), or (3) below:

(1) Organic HAP emissions shall not exceed more than 2 percent of the organic HAP applied during each rolling, 12-month compliance period;

(2) Organic HAP emissions shall not exceed 0.046 kg/liter of solids (0.38 lbs/gallon of solids) applied during each rolling, 12-month compliance period; or

(3) If an oxidizer is used to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 percent.

Applicable Compliance Method:

Compliancewiththe organic HAP emissionlimitations above shall bedeterminedthroughtherecordkeepingrequirementsestablishedin sections d) of the permit.

[Authority for term:OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart SSSS]

(2) The permittee shall conduct emission testing for this emissions unit in accordance with the requirements of 40 CFR Part 63, Subpart SSSS:

Option	Citation	Requirement
Options 1, 2, & 4	40 CFR 63.5160, Table 1	Determine the HAP or volatile matter and solids content of coating materials according to the procedures in 40 CFR Part 63.5160(b) and (c).

Option	Citation	Requirement
Options 3 & 4	40 CFR 63.5160, Table 1	Conduct a performance test for each capture and control system to determine: (1) the destruction or removal efficiency of each control device according to 63.5160(d), and (2) the capture efficiency of each capture system according to 40 CFR Part 63.5160(e).
Options 3 & 4	40 CFR 63.5160(a)	Performance test exemption criteria

[Authority for term:OAC rule 3745-77-07(C)(1),40 CF 63.5160 and 40 CFR 63.5170]

g) Miscellaneous Requirements

(1) None.

8. P012, #1 Strip Anneal Line

Operations, Property and/or Equipment Description:

No. 1 Strip Anneal line with preheat furnace and anneal drying oven furnace

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

(1) None.

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 3745-17-11(B)	None. See Section b)(2)a. below.
b.	OAC rule 3745-17-07(A)	None. See Section b)(2)b. below.
c.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO_2) emissions shall not exceed 118.2 lbs/hr. See Section b)(2)c. below

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

c. No monitoring, record keeping, or reporting is necessary because the only source of SO_2 emissions is from the combustion of natural gas and the SO_2 emissions from the combustion of natural gas is considered negligible.

c) Operational Restrictions

(1) The permittee shall burn only natural gas as fuel in this emissions unit.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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. Emissions Limitation:

SO_2 emissions shall not exceed 118.2lbs/hr

Applicable Compliance Method:

Compliance with the SO_2 emission limitation above is assumed since the only source of SO_2 emissions is from the combustion of natural gas and the SO_2 emissions from the combustion of natural gas is considered negligible.

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

[Authority for term:OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.