



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

8/14/2015

Certified Mail

Todd Harbour
Metal Coaters
10943 N. Sam Houston Pkwy W.
Houston, TX 77064

Facility ID: 1409000037
Permit Number: P0116073
County: Butler

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

Dear Permit Holder:

Enclosed is a final Ohio 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 Southwest Ohio Air Quality Agency as indicated on page one of your permit.

Sincerely,



Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Southwest Ohio Air Quality Agency



FINAL

**Division of Air Pollution Control
Title V Permit
for
Metal Coaters**

Facility ID:	1409000037
Permit Number:	P0116073
Permit Type:	Initial
Issued:	8/14/2015
Effective:	9/4/2015
Expiration:	9/4/2020



Division of Air Pollution Control
Title V Permit
for
Metal Coaters

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Final Title V Permit
Metal Coaters
Permit Number: P0116073
Facility ID: 1409000037
Effective Date: 9/4/2015

Authorization

Facility ID: 1409000037
Facility Description: Steel coil coating operation and associated processes
Application Number(s): A0049093
Permit Number: P0116073
Permit Description: Initial Title V Operating Permit for coil coating facility, including one continuous coil coating line and a gas-fired boiler.
Permit Type: Initial
Issue Date: 8/14/2015
Effective Date: 9/4/2015
Expiration Date: 9/4/2020
Superseded Permit Number:

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

Metal Coaters
2400 Yankee Road
Middletown, OH 45044

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

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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 Southwest Ohio Air Quality Agency. 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



Final Title V Permit
Metal Coaters
Permit Number: P0116073
Facility ID: 1409000037
Effective Date:9/4/2015

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 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 recordings for 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 submitted scheduled maintenance requests, 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 Southwest Ohio Air Quality Agency. 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency 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 permit except 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

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

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency) 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 intermittent consistent 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency 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, no emissions unit identified in this permit that has been certified 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 Requirements Under 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 the Southwest Ohio Air Quality Agency.
- 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 Southwest Ohio Air Quality Agency. 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 Requirements Under 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency 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 of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Southwest Ohio Air Quality Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Final Title V Permit
Metal Coaters
Permit Number: P0116073
Facility ID: 1409000037
Effective Date:9/4/2015

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 emissions unit contained in this permit is subject to 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (NSPS): B002. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart Dc. The permittee shall also comply with all the applicable requirements of 40 CFR Part 60, Subpart A (General Provisions), as identified within 40 CFR Part 60, Subpart Dc.

(Authority for term: 40 CFR Part 60)

3. The following emissions unit contained in this permit is subject to 40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants (NESHAP) Industrial, Commercial, and Institutional Boilers and Process heaters: B002. The complete NESHAP requirements, including the NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart DDDDD. The permittee shall also comply with all the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 10 of 40 CFR Part 63, Subpart DDDDD. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart DDDDD and Subpart A.

(Authority for term: 40 CFR Part 63)

4. The following emissions unit contained in this permit is subject to 40 CFR Part 63, Subpart SSSS, National Emission Standards for Hazardous Air Pollutants (NESHAP) Surface Coating of Metal Coil: K001. The complete NESHAP requirements, including the NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart SSSS. The permittee shall also comply with all the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart SSSS. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart SSSS and Subpart A.

(Authority for term: 40 CFR Part 63)

5. The following abbreviations are used throughout this permit:

NO_x = Nitrogen oxides

CO = Carbon monoxide



VOC = Volatile organic compounds

PE = Particulate matter measurable by the applicable test methods in 40 CFR Part 60, Appendix A, "Standards of Performance for New Stationary Sources"

PM₁₀ = Particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers as measured either by a reference method that is based on 40 CFR Part 50, Appendix J and designated in accordance with 40 CFR Part 53 or by an equivalent method designated in accordance with 40 CFR Part 53

SO₂ = Sulfur dioxide

HAP = Hazardous air pollutant

TPY = Ton(s) per year

MMBtu = million British thermal units

PTI = Permit to Install

CFR = Code of Federal Regulations

OAC = Ohio Administrative Code



Final Title V Permit
Metal Coaters
Permit Number: P0116073
Facility ID: 1409000037
Effective Date:9/4/2015

C. Emissions Unit Terms and Conditions



1. B002, Standby Steam Boiler

Operations, Property and/or Equipment Description:

25.1 MMBtu/hour natural gas and liquid propane gas-fired boiler equipped with a low NOx burner

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) PTI P0110536, issued 8/22/2012 <i>Best Available Technology (BAT) as established in PTI #14-03941, issued 12/13/1995</i>	NO _x emissions shall not exceed 0.084 pound per MMBtu* and 9.23 TPY*; CO emissions shall not exceed 0.15 pound per MMBtu* and 16.5 TPY*; VOC emissions shall not exceed 0.016 pound per MMBtu* and 1.76 TPY*; SO ₂ emissions shall not exceed 0.001 pound per MMBtu* and 0.11 TPY*; and PE shall not exceed 0.01 pound per MMBtu* and 1.10 TPY*. [PE is assumed to be equivalent to PM ₁₀] *The emission limitations outlined above are based upon the emissions unit's potential to emit. Therefore, no record keeping is required to demonstrate compliance with these limitations. See b)(2)a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 60, Subpart Dc <i>Standards of Performance (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units</i>	The emission standards specified by this rule for gaseous fuel combustion are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
e.	40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480-7575) <i>National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters</i> [In accordance with 63.7490 and 63.7499, the emissions unit is an existing boiler designed to burn gas 1 fuels and is subject to the work practice standards specified in this rule.]	Table 3 to 40 CFR Part 63, Subpart DDDDD – Work Practice Standards [40 CFR 63.7500]. See c)(1). Pursuant to 40 CFR 63.7495(b), the permittee shall comply with this subpart no later than January 31, 2016, except as provided in 63.6(i).
f.	40 CFR Part 63.1-15, Subpart A (40 CFR 63.7565)	Table 10 to 40 CFR Part 63, Subpart DDDDD – Applicability of General Provisions (Subpart A) to Subpart DDDDD shows which parts of the General Provisions in 40 CFR Part 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The BAT determination pursuant to OAC rule 3745-31-05(A)(3) for this emissions unit includes:
 - i. use of only natural gas and/or liquid propane gas (LPG) in this emissions unit; and
 - ii. employ a low NO_x burner in this emissions unit to reduce NO_x emissions to 0.084 pound per MMBtu.

b. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency (U.S. EPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency (Ohio EPA).

c) Operational Restrictions

(1) The permittee shall comply with the applicable work practices required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7500, 63.7515(d), 63.7540, and Table 3 to Subpart DDDDD	annual tune-up requirements
63.7500 and Table 3 to Subpart DDDDD	one-time energy assessment requirements
63.7500(a)(3)	general duty to minimize emissions

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart DDDDD)

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall record and maintain records of the amount of each fuel combusted during each operating day in accordance with 40 CFR 60.48c(g)(1), except as provided below.

a. As an alternative to the daily record keeping requirements specified in 40 CFR 60.48c(g)(1):

- i. the permittee may elect to record and maintain records of the amount of each fuel combusted during each calendar month in accordance with 40 CFR 60.48c(g)(2); or
- ii. the permittee may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month in accordance with 40 CFR 60.48c(g)(3).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart Dc)

(2) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7555	required overall records to be maintained
63.7560	record format and retention requirements

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

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0110536, issued 8/22/2012: d)(1) - d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit notification of the date of construction or reconstruction and actual startup in accordance with the requirements of 40 CFR 60.48c(a) and 40 CFR 60.7. [Notifications for this emissions unit were previously submitted pursuant to this requirement; therefore a notification is not required subsequent to this permitting action.]

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart Dc)

- (2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7530(d)-(e) and 63.7545	Notification of Compliance Status requirements
63.7550 and Table 9 to Subpart DDDDD	content and submission of compliance reports

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

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0110536, issued 8/22/2012: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitations:

NO_x emissions shall not exceed 0.084 pound per MMBtu and 9.23 TPY;

CO emissions shall not exceed 0.15 pound per MMBtu and 16.5 TPY;



VOC emissions shall not exceed 0.016 pound per MMBtu and 1.76 TPY;

SO₂ emissions shall not exceed 0.001 pound per MMBtu and 0.11 TPY; and

PE shall not exceed 0.01 pound per MMBtu and 1.10 TPY.

Applicable Compliance Methods:

The NO_x, CO, VOC, PE, and SO₂ emission limitations above are based upon the emissions unit's potential to emit using the manufacturer's guaranteed emission rates, in pound per MMBtu, when firing either natural gas or LPG as provided with the application for PTI #14-03941, submitted on July 31, 1995. The annual emissions were calculated based upon the maximum emissions rate for each pollutant in pound per MMBtu, the emissions unit's maximum rated heat input at 25.1 MMBtu per hour, and 8,760 hours of operation per year.

If required, the permittee shall demonstrate compliance with the pound per MMBtu emission limitations for each pollutant through emission tests performed in accordance with 40 CFR Part 60, Appendix A.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

b. **Emission Limitation:**

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 3745-17-07(A))

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0110536, issued 8/22/2012: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) **Miscellaneous Requirements**

- (1) None.

2. K001, Coating Line

Operations, Property and/or Equipment Description:

Coil Coating Line, consisting of four coating stations and two natural gas-fired high-bake ovens, two thermal oxidizers, and a rotor VOC concentrator equipped with a catalytic oxidizer.

- 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) PTI P0117328, issued 9/22/2014 <i>Best Available Technology (BAT)</i>	For the emissions from coatings and solvents employed in the surface coating operations, the requirements of this rule shall be demonstrated by compliance with the requirements of 40 CFR Part 63, Subpart SSSS, for surface coating. From the combustion of natural gas (high-bake ovens, thermal oxidizers, and concentrator catalytic oxidizer): NO _x emissions shall not exceed 2.89 tons* per month averaged over a 12-month rolling period; and CO emissions shall not exceed 2.42 tons* per month averaged over a 12-month rolling period. *The emission limitations outlined above are based upon the emissions unit's potential to emit. Therefore, no record keeping is required to demonstrate compliance with these limitations.
b.	OAC rule 3745-31-05(D) <i>Federally-Enforceable Limitations to Avoid Major Stationary Source Status under New Source Review</i>	VOC emissions shall not exceed 96.0 TPY, as a rolling 12-month summation, from all coatings and solvents employed. See b)(2)a., c)(1), c)(2), and c)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-09(E) OAC rule 3745-21-09(B)(6) <i>Reasonably Available Control Technology (RACT) for Coil Coating Lines</i>	The requirements of these rules are less stringent than the requirements established pursuant to 40 CFR Part 63, Subpart SSSS, OAC 3745-31-05(A)(3), and OAC rule 3745-31-05(D).
d.	40 CFR Part 63, Subpart SSSS (40 CFR 63.5080-5209) <i>National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Coil</i> [In accordance with 63.5100 and 63.5110, the emissions unit is an existing coil coating line subject to the emission limitations/control measures specified in this rule.]	See b)(2)c. for the applicable emissions standards. Table 1 to 40 CFR Part 63, Subpart SSSS – Operating Limits if Using Add-on Control Devices and Capture System [40 CFR 63.5121]
e.	40 CFR Part 63.1-15, Subpart A (40 CFR 63.5140)	Table 2 to 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 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The annual VOC emissions from natural gas combustion in this emissions unit, based upon the potential to emit of 0.0054 pound of VOC per MMBtu and the maximum heat input capacity of 80.7 MMBtu per hour for all combustion sources on the emissions unit, is 1.91 TPY of VOC assuming 8,760 hours of operation per year. Compliance with the federally-enforceable VOC limitation in b)(1)b. combined with the potential to emit of 1.91 TPY VOC from natural gas combustion will ensure that the source avoids major status under nonattainment new source review.
- b. “Solvent” as used in the terms and conditions of this permit for emissions unit K001 shall be defined as both reducing solvent added to any coatings and solvent used for cleanup and line purging.
- c. Each coil coating affected source must limit organic HAP emissions to the level specified in i., ii. or iii. below [40 CFR 63.5120]:
 - i. No more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction); or

- ii. No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or
- iii. If you use an oxidizer 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 with one of these standards must be demonstrated by following the applicable procedures in 40 CFR 63.5170.

c) Operational Restrictions

(1) The federally-enforceable limitations established pursuant to OAC rule 3745-31-05(D) for this emissions unit include the following:

a. Rotor VOC concentrator in operation:

- i. all VOC emissions from this emissions unit shall be captured within the coating stations and vented to the thermal oxidizers and the rotor VOC concentrator. The thermal oxidizers and rotor VOC concentrator shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation;
- ii. each thermal oxidizer shall provide an efficiency (percent destruction) of not less than 98 percent, by weight, for the VOC emissions vented to it; and
- iii. the rotor VOC concentrator with catalytic oxidizer shall provide an efficiency (percent destruction) of not less than 95 percent, by weight, for the VOC emissions vented to it.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(D))

b. Rotor VOC concentrator not in operation:

- i. all VOC emissions from this emissions unit shall be captured within the coating stations and vented to the thermal oxidizers. The thermal oxidizers shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation; and
- ii. each thermal oxidizer shall provide an efficiency (percent destruction) of not less than 98 percent, by weight, for the VOC emissions vented to it.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(D))

(2) The maximum coating and solvent usage for this emissions unit shall be limited by the following formula, calculated as a rolling 12-month period:

$$\frac{\{\sum(\text{VOCa})(U_{aWC}) - \text{RCa}\}}{2000 \text{ lbs/tons}} \times (1 - \text{DRE}_{tWC})(\text{CAEc})(0.96^*) +$$

$$\frac{\{\sum(\text{VOCa})(\text{Ua}_{\text{WC}}) - \text{RCa}\}}{2000 \text{ lbs/tons}} \times (1 - \text{DREv})(\text{CAEc})(0.04^*) +$$

$$\frac{\{\sum(\text{VOCa})(\text{Ua}_{\text{WOC}}) - \text{RCa}\}}{2000 \text{ lbs/tons}} \times (1 - \text{DREt}_{\text{WOC}})(\text{CAEc}) \leq 96 \text{ TPY of VOC.}$$

where,

VOCa = volatile organic compound content (lb/gal) of coating a and solvent a, applied at the coating stations;

Ua_{WC} = usage (gallons) of coating a and solvent a, applied at the coating stations, when the concentrator is in operation;

Ua_{WOC} = usage (gallons) of coating a and solvent a, applied at the coating stations, when the concentrator is not in operation;

RCa = Recovery credit for pounds of VOC recovered from waste solvent at the coating stations;

DREt_{WC} = destruction removal efficiency of the thermal oxidizers** when the concentrator is in operation;

DREt_{WOC} = destruction removal efficiency of the thermal oxidizers** when the concentrator is not in operation;

CAEc = capture efficiency of the coating stations (100%); and

DREv = destruction removal efficiency of the VOC concentrator.

*Fractional percentages of the captured emissions within the coating stations attributed to exhaust through the oven/thermal oxidizer system and the VOC concentrator system confirmed through exhaust stream testing conducted pursuant to PTI P0117328.

**The permittee shall utilize the lowest average destruction efficiency value of either thermal oxidizer based upon the most recent performance test, which demonstrated compliance with the terms and conditions of this permit, pursuant to the formula above. Alternatively, if the permittee elects to demonstrate compliance by calculating separate prime and finish coating usage and emissions, the permittee may request approval from the Ohio EPA District Office or local air agency for an alternative formula limiting VOC emissions to 96 TPY or less. Approved revisions to the formula specified above will not constitute a relaxation of the operational or monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(D))

- (3) The VOC concentrator's catalytic oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals when the emissions unit controlled by the VOC concentrator is in operation. The conversion efficiency of the catalyst, as determined in an annual catalyst activity test, shall be sufficient to meet the destruction efficiency and control efficiency

requirements of this permit at a test temperature that is equal to that temperature at which the inlet to the catalyst bed is set. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(D))

- (4) The permittee shall comply with the applicable operating restrictions required under 40 CFR Part 63, Subpart SSSS, including the following sections:

63.5121 and Table 1 to Subpart SSSS	operating limitations using add-on control devices
63.5140(a)	general compliance requirements

(Authority for term: OAC rules 3745-77-07(A)(1), 3745-31-05(A)(3), and 40 CFR Part 63, Subpart SSSS)

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

- (1) The permittee shall collect and record the following information each month for this emissions unit:
- a. the company identification for each coating and solvent employed;
 - b. the VOC content of each coating and solvent employed, in pounds of VOC per gallon;
 - c. the amount of each coating and solvent employed, in gallons per month;
 - d. the uncontrolled total VOC emissions from all coatings and solvent employed, in pounds or tons per month, prior to any credit for recovered materials;
 - e. if a credit for recovered materials is used, the total VOC emissions from recovered materials to be credited against the total VOC emissions from all coatings and solvent employed, in pounds or tons (see d)(2) below);
 - f. the uncontrolled total VOC emissions from all coatings and solvent employed, in pounds or tons per month, adjusted for any recovery credit;
 - g. the controlled net VOC emissions from all coatings and solvents, employed, in pounds or tons per month (based on the most recent emissions testing);
 - h. the updated rolling, 12-month summation total, in tons, of VOC emissions (the total amount of VOC emissions for the current month recorded in line g. plus the total amount of VOC emissions for the previous 11 calendar months); and
 - i. each period of time (start time and date, and end time and date) when the damper to the VOC concentrator is closed.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

- (2) If waste solvent is collected for off-site disposal and/or recovery, the following records shall be maintained if a credit is to be applied to the monthly VOC emissions:
- a. the amount of waste solvent recovered during the month* for off-site disposal and/or recovery, in gallons (or pounds, if records of recovered solvent is maintained by weight and VOC content in percent by weight);
 - b. the VOC content of the recovered waste solvent, which shall be based upon an independent laboratory analyses performed for waste stream characterization within the previous 12 months or a laboratory analysis by the facility to which the waste solvent is shipped; and
 - c. the date the recovered waste solvent was shipped, the amount shipped (minus the container), and the name and address of the receiving, disposal, and/or recovery facility.

* The monthly total volume or weight of the collected waste solvent may be calculated using a prorated method by averaging the volume or weight of the waste solvent recovered and shipped off-site over the number of operating days since the previous shipment.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

- (3) The permittee shall operate and maintain continuous temperature monitors and recorders that measure and record the combustion temperature within each thermal oxidizer, the inlet temperature to the VOC concentrator desorption/reactivation zone when the emissions unit controlled by the VOC concentrator is in operation, and the temperature of the exhaust gases immediately before the catalyst bed when the emissions unit controlled by the VOC concentrator is in operation, including periods of startup and shutdown. The monitors and data recorders shall comply with the requirements of 40 CFR Part 63, Subpart SSSS, as specified in d)(5).

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-31-05(D), and 40 CFR Part 63, Subpart SSSS)

- (4) The permittee shall perform a preventative maintenance inspection of the VOC concentrator's catalytic oxidizer in accordance with the manufacturer's suggested frequency to evaluate the performance of the catalyst bed when the emissions unit controlled by the VOC concentrator is in operation. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, and shall include a physical inspection of the unit and all of the associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment and the catalyst shall be performed as determined by the inspection. A sample of the catalyst material shall be collected from the catalyst bed and used to perform a catalyst activity test annually, unless more frequent testing is recommended by the manufacturer. The permittee shall maintain a record of the results of each inspection and the results of each annual catalyst activity test.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

- (5) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart SSSS, including the following sections:

Table 1 to 63.5150, 63.5150(a)(3), and 63.5150(a)(4)	control device and capture system monitoring requirements
Table 1 to 63.5170 including 63.5170(a) – (i)	compliance demonstration requirements
63.5190	record keeping requirements

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-31-05(D), and 40 CFR Part 63, Subpart SSSS)

- (6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0117328, issued 9/22/2014: d)(1) - d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. an identification of any deviation from the VOC capture and control efficiency requirements for this emissions unit specified in term and condition c)(1); and
 - b. an identification of all exceedances of the rolling, 12-month VOC emission limitation of 96.0 TPY for this emissions unit.

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 rules 3745-77-07(C)(1) and 3745-31-05(D))

- (2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart SSSS, including the following section:

63.5180(g) – (h)	semi-annual reporting requirements, including deviations and monitoring downtime
63.5180(b) – (d)	notification requirements

63.5180(e)	performance test reports
63.5180(f)	startup, shutdown and malfunction reports

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), 3745-31-05(D), and 40 CFR Part 63, Subpart SSSS)

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0117328, issued 9/22/2014: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitations:

From the combustion of natural gas:

NO_x emissions shall not exceed 2.89 tons per month averaged over a 12-month rolling period.

CO emissions shall not exceed 2.42 tons per month averaged over a 12-month rolling period.

Applicable Compliance Method:

The NO_x and CO emission limitations above are based upon the emissions unit's potential to emit from the combustion of natural gas and the US EPA's AP-42 emission factors for uncontrolled combustor types less than 100 MMBtu per hour found in Section 1.4, Table 1.4-1, dated 7/1998.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

b. Emission Limitation:

VOC emissions shall not exceed 96.0 TPY, as a rolling 12-month summation, from all coatings and solvents employed.

Applicable Compliance Method:

From the combustion of natural gas:

The VOC emission limitation above is based upon the emissions unit's potential to emit from the combustion of natural gas and the US EPA's AP-42 emission factors found in Section 1.4, Table 1.4-2, dated 7/1998.

From the coating and solvent use:

Compliance with the VOC emission limitation shall be demonstrated by the record keeping required in d)(1) and the performance testing required in f)(3) below. U.S. EPA Method 24 or formulation data shall be used to determine the VOC content of the coatings and solvents.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

c. Emission Limitations:

No more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction); or

No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or

If you use an oxidizer 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 Methods:

Compliance with the organic HAP emission limitations found in 40 CFR Part 63, Subpart SSSS, shall be based upon the compliance demonstration utilized by the permittee pursuant to Table 1 of 40 CFR 63.5170 and the record keeping and performance testing requirements specified in 40 CFR 63.5080-5209.

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 40 CFR Part 63, Subpart SSSS)

- (2) The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected annually (or more frequently if prescribed by the manufacturer) as described in d)(4) of this permit when the emissions unit controlled by the VOC concentrator is in operation. An "Intent to Test" notification shall not be required for catalyst activity testing. The procedures for the catalyst activity test shall be conducted in accordance with the manufacturer's recommendations and as required by the appropriate test method.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

- (3) 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 2.5 years following the effective date of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the requirements specified in term and condition c)(1) for the VOC capture efficiency of the coating stations and a destruction efficiency of 98 percent for VOC

emissions entering each thermal oxidizer and a destruction efficiency of 95 percent for VOC emissions entering the VOC concentrator.

- c. The following test method(s) shall be employed to demonstrate compliance:
 - i. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
 - ii. The control efficiency (i.e. the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- 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 rules 3745-77-07(C)(1), 3745-31-05(D), and 3745-15-04)

- (4) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart SSSS, including the following sections:

Table 1 to 63.5160 including 63.5160(a) – (e)	compliance demonstration and performance testing requirements
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(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 40 CFR Part 63, Subpart SSSS)

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0117328, issued 9/22/2014: f)(1) – f)(4). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.