



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

8/27/2015

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1667040015  
 Permit Number: P0119250  
 Permit Type: Initial Installation  
 County: Portage

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Record Courier. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
 Permit Review/Development Section  
 Ohio EPA, DAPC  
 50 West Town Street Suite 700  
 PO Box 1049  
 Columbus, Ohio 43216-1049

and Akron Regional Air Quality Management District  
 1867 West Market St.  
 Akron, OH 44313

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
 ARAQMD; Pennsylvania; West Virginia; Canada



## PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: [HClerk@epa.ohio.gov](mailto:HClerk@epa.ohio.gov)

Draft Air Pollution Permit-to-Install and Operate Initial Installation  
Schneller LLC

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

ID#:P0119250

Date of Action: 8/27/2015

Permit Desc:Initial installation of reverse roll coating line #110 controlled with a regenerative thermal oxidizer..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Sean Vadas, Akron Regional Air Quality Management District, 1867 West Market St., Akron, OH 44313. Ph: (330)375-2480





**Permit Number:** P0119250  
**Facility Name:** Schneller LLC  
**Facility ID:** 1667040015  
**Working Copy of a Permit in Progress**

## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. **Source Description:** Schneller LLC is a manufacturer of engineered decorative products for the interiors of airplanes. Schneller's facility consists of four coating lines (K001, K003, K004 and K005), two silkscreen printing operations (K006 and K009), twenty-nine mixers (P002 which has eight mixers and P011 through P031), vat drying (P008) and several permit exempt sources. This permit allows for the installation of a new coating line K011 and will maintain the existing facility-wide emission limitations.
3. **Facility Emissions and Attainment Status:** In the existing federally enforceable permit, emissions are limited for VOC, any individual hazardous air pollutant (HAP) and combined HAPs to 80.0 tons per year, 8.0 tons per year\* and 20.0 tons per year\* based on a rolling, 12-month summation of the monthly emissions for emissions units K001, K003, K004, K005, K006, K009, P002, P008 and P011 through P031. Portage County is non-attainment for ozone. K011 will be included with the facility-wide emission limitations.
4. **Source Emissions:** Schneller LLC has requested to limit the potential to emit for VOC, any individual hazardous air pollutant (HAP) and combined HAPs to 80.0 tons per year, 8.0 tons per year\* and 20.0 tons per year\* based on a rolling, 12-month summation of the monthly emissions for emissions units K001, K003, K004, K005, K006, K009, K011, P002, P008 and P011 through P031.
5. **Conclusion:** Through record keeping of the coating, thinner, additive and cleanup materials usage and the VOC and HAP contents for emissions units K001, K003, K004, K005, K006, K009, and K011 record keeping of the amount of material mixed and cleanup material usage and VOC and HAP contents for emissions units P002 and P011 through P031 and record keeping of the number of vats dried and wiped out, the number of drums dried, the amount of solvent used in the vat cleaner and the VOC and HAP contents of the solvent for emissions unit P008, Schneller LLC will demonstrate compliance with the above-mentioned emissions limitations. By accepting the above-mentioned emissions limitations, Schneller LLC will avoid non-attainment NSR and Title V permitting and will continue to be classified as an area source for the National Emission Standards for Printing and Publishing Industry, 40 CFR Part 63, Subpart KK.
6. Please provide additional notes or comments as necessary:  
  
None



**Permit Number:** P0119250  
**Facility Name:** Schneller LLC  
**Facility ID:** 1667040015  
**Working Copy of a Permit in Progress**

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	80.0**
Any Individual HAP	8.0**
Combined HAPs	20.0**

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

\*\*Allowable emissions are based on a rolling 12-month summation of the monthly emissions.



**DRAFT**

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

Facility ID:	1667040015
Permit Number:	P0119250
Permit Type:	Initial Installation
Issued:	8/27/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control  
Permit-to-Install and Operate**

for  
Schneller LLC

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**Draft Permit-to-Install and Operate**  
Schneller LLC

**Permit Number:** P0119250

**Facility ID:** 1667040015

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 1667040015  
Application Number(s): A0053873  
Permit Number: P0119250  
Permit Description: Initial installation of reverse roll coating line #110 controlled with a regenerative thermal oxidizer.  
Permit Type: Initial Installation  
Permit Fee: \$500.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 8/27/2015  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

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

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



**Draft Permit-to-Install and Operate**  
Schneller LLC

**Permit Number:** P0119250

**Facility ID:** 1667040015

**Effective Date:** To be entered upon final issuance

## Authorization (continued)

Permit Number: P0119250

Permit Description: Initial installation of reverse roll coating line #110 controlled with a regenerative thermal oxidizer.

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

<b>Emissions Unit ID:</b>	<b>K011</b>
Company Equipment ID:	110-LINE
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install and Operate**

Schneller LLC

**Permit Number:** P0119250

**Facility ID:** 1667040015

**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**

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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

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

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

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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

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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

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

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

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

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

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

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

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

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

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



**Draft Permit-to-Install and Operate**

Schneller LLC

**Permit Number:** P0119250

**Facility ID:** 1667040015

**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) All.
2. SchnellerLLC has requested to restrict the emissions of volatile organic compounds (VOC), any individual hazardous air pollutant (HAP)<sup>1</sup> and combined HAPs to 80.0 tons per year, 8.0 tons per year\* and 20.0 tons per year\*, respectively, based upon the rolling, 12-month summation of the monthly emissions. Schneller proposed these emission limitations to avoid being classified as a major source for Nonattainment New Source Review (NSR) and Title V permitting and to establish the facility as an area source for the National Emission Standards for the Printing and Publishing Industry, 40 CFR Part 63, Subpart KK.Schneller, LLC has accepted these emission limitations as a facility-wide cap on VOC, any individual HAP and combined HAPs emissions from the following emissions units: K001, K003, K004, K005, K006, K009,K011, P002, P008, P011, P012 and P014.

\*The emission limitations for any individual HAP and combined HAPs include the HAP emissions from the permit exempt and “De Minimis” sources.
3. In order to determine compliance with the facility-wide VOC, any individual HAP and combined HAPs emission limitations, the permittee shall maintain monthly records of the following information for emissions units: K001, K003, K004, K005, K006, K009,K011, P002, P008, P011, P012 and P014.
  - a) The permittee shall collect and record the following information each month for each controlled emissions units K001, K003, K004, K005 and K011:
    - (1) the name and identification number/code of each coating<sup>2</sup>, cleanup material and any other material containing any VOC and/or any HAP;
    - (2) the VOC content of each material applied, in pounds per gallon or weight fraction, i.e., pound of VOC per pound of material applied;
    - (3) the name/identification of each individual HAP contained in each material applied (and identified in a)(1) above) and the pound(s) of each HAP per gallon of each HAP-containing material applied or the weight fraction of each individual HAP contained in each material applied (and identified in a)(1) above) i.e., pound of each individual HAP per pound of each HAP-containing material applied;
    - (4) the number of gallons or pounds of each coating, cleanup material and other material applied during the month;

- (5) the total uncontrolled VOC emissions for each emissions unit from the coating operations for the month, in ton(s), i.e., the summation of the products of a)(2) times a)(4) for all the coating materials (not including cleanup materials) applied during the month, divided by 2,000 pounds per ton;
- (6) the total uncontrolled VOC emissions for each emissions unit from the cleanup materials employed, in ton(s), i.e., the summation of the products of a)(2) times a)(4) for all the cleanup materials applied during the month, divided by 2,000 pounds per ton;
- (7) for each individual HAP, the total uncontrolled emissions from the coating operations for the month, in ton(s), i.e., for each individual HAP, the summation of the products of a)(3) times a)(4) for all the coating materials (not including cleanup materials) applied during the month, divided by 2,000 pounds per ton;
- (8) for each individual HAP, the total uncontrolled emissions from the cleanup materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of a)(3) times a)(4) for all the cleanup materials applied during the month, divided by 2,000 pounds per ton;
- (9) the total VOC emissions for each emissions unit, the sum of (i) the calculated, controlled emission rate from all the coating materials (not including cleanup materials) applied during the month, in ton(s), i.e., the total uncontrolled VOC emission rate calculated in a)(5) above, multiplied by (1 minus the overall control efficiency for the control equipment), as determined during the most recent emissions test that demonstrated the emissions unit was in compliance, and (ii) the uncontrolled VOC emissions from the cleanup materials employed during the month, as calculated in a)(6) above;
- (10) for each individual HAP, the sum of (i) the calculated, controlled emission rate from all the coating materials (not including cleanup materials) applied during the month, in ton(s), i.e., the total uncontrolled individual HAP emission rate calculated in a)(7) above, multiplied by (1 minus the overall control efficiency for the control equipment), as determined during the most recent emissions test that demonstrated the emissions unit was in compliance, and (ii) the uncontrolled individual HAP emissions from the cleanup materials employed during the month, as calculated in a)(8) above.

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

- b) The permittee shall collect and record the following information each month for emissions units K006 and K009, combined:
- (1) the name and identification number/code of each coating<sup>2</sup>, cleanup material and any other material containing any VOC and/or HAP;
  - (2) the VOC content of each material applied, in pounds per gallon or weight fraction, i.e., pound of VOC per pound of material applied;
  - (3) the name/identification of each individual HAP contained in each material applied (and identified in b)(1) above) and the pound(s) of each HAP per gallon of each HAP-

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

- (4) the number of gallons or pounds of each coating, cleanup material and other material applied during the month;
- (5) the total VOC emissions from all the materials applied, in ton(s), i.e., the summation of the products of b)(2) times b)(4) for all the materials applied during the month, divided by 2000 pounds per ton;
- (6) for each individual HAP, the total emissions from all the materials applied, in ton(s), i.e., for each individual HAP, the summation of the products of b)(3) times b)(4) for all the materials applied during the month, divided by 2,000 pounds per ton.

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

- c) The permittee shall collect and record the following information each month for emissions units P002, P011, P012 and P014, combined:
  - (1) the amount of material mixed, in pounds per month;
  - (2) the VOC emission rate from the mixing operation, excluding cleanup material, in ton(s) per month, i.e., multiply the emission factor of 0.00356\* pound of VOC per pound of material mixed by c)(1), divided by 2000 pounds per ton;
  - (3) the amount of each HAP-containing material applied in the controlled coating lines, in gallons per month;
  - (4) for each individual HAP, the HAP content of each HAP-containing material applied in the controlled coating lines, in pounds per gallon;
  - (5) for each individual HAP, individual HAP emission rate from the mixing operation, excluding cleanup material, in ton(s) per month, by conservatively assuming that all VOC emissions are HAP, i.e., multiply the emission factor of 0.00356\* pound of VOC per pound of material mixed by c)(3) times c)(4), divided by 2000 pounds per ton;
  - (6) the name and identification of each cleanup material employed;
  - (7) the VOC content of each cleanup material, in pounds of VOC per gallon;
  - (8) for each individual HAP, the pound(s) of each HAP per gallon of each HAP-containing cleanup material applied;
  - (9) the number of gallons of each cleanup material employed;
  - (10) the total VOC emissions from all cleanup materials employed, in ton(s), i.e., the summation of the products of c)(7) times c)(9) for all the cleanup materials employed during the month, divided by 2000 pounds per ton;

- (11) for each individual HAP, the total emissions from the cleanup materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of a)(8) times a)(9) for all the cleanup materials employed during the month, divided by 2,000 pounds per ton;
- (12) the total VOC emission rate from the mixing operation and all the cleanup materials employed, in ton(s), i.e., c)(2) plus c)(10);
- (13) for each individual HAP, the total emissions from the mixing operation and all the cleanup materials employed, in ton(s), i.e., c)(5) plus c)(11) for each HAP.

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

- d) The permittee shall collect and record the following information each month for emissions unit P008:
- (1) the number of vats dried;
  - (2) the number of vats wiped out with solvent;
  - (3) the number of drums dried;
  - (4) the total VOC emission rate, in ton(s), i.e., multiply the emission factor of 3.0 pounds of VOC per vat dried\* by d)(1) plus 3.94 pound of VOC per vat wipe-cleaned\* times d)(2) plus 0.72 pound of VOC per drum dried\* times d)(3), divided by 2000 pounds per ton;
  - (5) for each individual HAP, the individual HAP to VOC ratio for each HAP for each solvent employed;
  - (6) for each individual HAP, the total uncontrolled emissions from all the solvents employed, in ton(s), i.e., for each HAP, the summation of the products of d)(4) times d)(5) for all the solvents employed during the month;
  - (7) the date and volume of each solvent addition to the vat cleaner, in gallons;
  - (8) the VOC content of each solvent added to the vat cleaner, in pounds of VOC per gallon;
  - (9) the date and volume of solvent mix removed from the vat cleaner, in gallons;
  - (10) the VOC content of each solvent removed from the vat cleaner, in pounds of VOC per gallon;
  - (11) the total VOC emission rate, in ton(s), i.e., the summation of the products of d)(7) times d)(8) for all the additions since the last removal minus d)(9) times d)(10) to obtain total VOC emissions, divided by 2000 pounds per ton, then divide by the number of months between the current and previous solvent removal). Note that the emissions will be calculated on a batch cycle basis and distributed evenly across the months that batch was in use;

- (12) for each individual HAP, the individual HAP to VOC ratio for each HAP for each solvent mix employed;
- (13) for each individual HAP, the total uncontrolled emissions from all the solvents employed, in ton(s), i.e., for each HAP, the summation of the products of d)(11) times d)(12) for all the solvents employed during the month;
- (14) the total VOC emission rate from all solvents employed, in ton(s), i.e., d)(4) plus d)(11); and
- (15) for each individual HAP, the total uncontrolled emissions from all solvents employed, in ton(s), i.e., for each individual HAP, d)(6) plus d)(13).

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

e) The permittee shall collect and record the following information each month for the facility (emissions units K001, K003, K004, K005, K006, K009, K011, P002, P008, P011, P012 and P014, combined):

- (1) the VOC emissions from all the materials employed, in ton(s) per month, i.e., the sum of all coating line emissions in 3.a)(9) plus 3.b)(5) plus 3.c)(12) plus 3.d)(14);
- (2) for each HAP, the individual HAP emissions from all the materials employed, in ton(s) per month, i.e., 3.a)(10) plus 3.b)(6) plus 3.c)(13) plus 3.d)(15) plus  $X^{*}/12$ ;
- (3) the total combined HAPs emissions from all the materials applied during the month, in ton(s) per month, i.e., the summation of all the individual HAP emissions calculated in e)(2) above;
- (4) the VOC emissions during the rolling 12-month period, i.e., the summation of all VOC emissions, as recorded in e)(1) above, for the present month plus the previous 11 months of operation, in ton(s);
- (5) for each individual HAP, the calculated total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in e)(2) above, for the present month plus the previous 11 months of operation, in ton(s); and
- (6) the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in e)(3) above, for the present month plus the previous 11 months of operation, in ton(s).

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

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

4. The permittee shall submit quarterly deviation (excursion) reports that identify:
- a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - (1) all exceedances of the rolling, 12-month emission limitation for VOC;
    - (2) all exceedance of the rolling, 12-month emission limitation for any individual HAP; and
    - (3) all exceedance of the rolling, 12-month emission limitation for combined HAPs.
  - b) the probable cause of each deviation (excursion);
  - c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d) the magnitude and duration of each deviation (excursion).

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

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

5. Compliance with the emissions limitations in 2 above shall be determined in accordance with the following methods:
- a) Emissions Limitations:
    - 80.0 tons of VOC per year, based upon the rolling, 12-month summation of the monthly emissions
    - 8.0 tons of any individual HAP per year, based upon the rolling, 12-month summation of the monthly emissions
    - 20.0 tons of combined HAPs per year, based upon the rolling, 12-month summation of the monthly emissions
- Applicable Compliance Method:
- Compliance with the annual allowable VOC, individual HAP and combined HAPs emissions limitations above shall be demonstrated based upon the record keeping requirements established in 3.a), 3.b), 3.c), 3.d) and 3.e) above.
- Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings, thinners, additives, cleanup materials and any other materials containing VOC. Formulation



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



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## **C. Emissions Unit Terms and Conditions**



**1. K011, 110-LINE**

**Operations, Property and/or Equipment Description:**

110 Line Reverse Roll Coater and 2.5 MMBtu/hr Natural Gas-Fired Drying Oven Controlled with a Regenerative Thermal Oxidizer.

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

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

a. None.

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

a. All except b)(1)e.,d)(14) through d)(17), and e)(4) below.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	The BAT requirement for VOC emissions is equivalent to destruction efficiency established under OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Major Nonattainment New Source Review and Title V permitting and to avoid being classified as a major source under 40 CFR Part 63, Subpart KK)	See 2, 3, 4 and 5 of Section B. Facility-Wide Terms and Conditions.  The VOC emissions shall be vented to a thermal oxidizer capable of achieving a control (destruction) efficiency which is at least 96 percent, by weight, for VOC.  The overall control efficiency for VOC shall be at least 95 percent, by weight.
c.	OAC rule 3745-21-19(D)(2)	The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3) and OAC



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule 3745-31-05(D).
d.	40 CFR Part 60, Subpart FFF	<p>The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).</p> <p>The temperature sensor is located in the combustion chamber at the exhaust outlet. This sensor location and monitoring, record keeping, and reporting requirements of OAC rule 3745-21-19 have been deemed to satisfy the monitoring, record keeping, and reporting requirements of 40 CFR Part 60, Subpart FFF except that the continuous monitoring device shall be calibrated annually and have an accuracy of <math>\pm 0.75</math> percent of the temperature being measured, expressed in degrees Celsius, or <math>\pm 2.5</math> °C, whichever is greater.</p>
e.	OAC rule 3745-114-01 ORC 3704.03(F)(4)(c)	See d)(14) through d)(17), and e)(4) below.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

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

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

- (3) While operating a VOC emission control system, the permittee shall not operate any capture or control device within the VOC emission control system at a three-hour block average value less than 1404 degree Fahrenheit or at a three-hour block average value less than the operating limits (operating parameter values) established during the most recent compliance test(s) that demonstrated compliance, except during periods of startup, shutdown and malfunction.
- (4) The permittee shall inspect the VOC emission control system and monitoring equipment to assure that the VOC emission control system is operating properly, and that no leaks or malfunctions have occurred or are occurring. The inspections shall be made at the frequency defined by the equipment manufacturer, or as otherwise appropriate for each VOC emission control system and monitoring equipment, but not less than monthly.
- (5) For any capture system that is part of a VOC emissions control and that contains bypass lines which could divert flow (i.e., VOC emissions) away from the control device to the atmosphere, the permittee shall for each bypass line employ a valve closure monitoring system that ensures any bypass line valve is in the closed (nondiverting) position through monitoring of valve position at least once every fifteen minutes. The permittee shall inspect the monitoring system at least once every month to verify that the monitor will indicate valve position.
- (6) Establish the operating limit as follows:
  - a. Monitor and record the combustion temperature either in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs at least once every fifteen minutes during each of the three runs of the compliance test.
  - b. Calculate and record the average combustion temperature maintained during the compliance test. This average combustion temperature is the minimum operating limit for the thermal oxidizer.
- (7) The pressure drop across the permanent total enclosure shall be at least 0.007 inch of water.
- (8) The following types of records are to be maintained by the permittee of an aerospace manufacturing or rework facility subject to OAC rule 3745-21-19:
  - a. Compliance demonstration records for coating operations.
  - b. Compliance demonstration records for cleaning operations.
  - c. Monitoring records for VOC emission control systems.
- (9) The permittee shall maintain the following records:
  - a. For each coating in use at the facility:
    - i. The name and VOC content as received and as applied.

- ii. The type of coating, as identified in paragraphs (D)(1)(a) and (D)(1)(b) of OAC rule 3745-21-19.
    - iii. Where applicable, identification of the coating as designated for control pursuant to paragraph (D)(2) of OAC rule 3745-21-19 or exempted pursuant to paragraphs (D)(3)(a) to (D)(3)(e) of OAC rule 3745-21-19.
  - b. The amount (gallons) of each coating used each month at the facility.
  - c. For any coating operation controlled by a VOC emission control system:
    - i. identification of the coating line;
    - ii. documentation on the overall control efficiency of the VOC emission control system and the control efficiency of the thermal oxidizer within the VOC emission control system, including design estimates and the results of compliance tests conducted pursuant to paragraphs (F)(2), (F)(3), and (I) of OAC rule 3745-21-19; and
    - iii. for any coating that is controlled by the VOC emission control system, the name of the coating, the dates (or time periods) of control, and the amount (gallons) of such coating controlled each month.
- (10) For any VOC emission control system, the permittee shall maintain monitoring records as follows for the thermal oxidizer:
  - a. continuous records of the firebox temperature;
  - b. records of all three-hour block averages of the firebox temperature during operation of the emissions unit;
  - c. a record of the operating limit established in d)(6) above; and
  - d. records of the times and durations of all periods during process or control operation when the monitoring device is not working.
- (11) For the capture system bypass line that could divert flow (i.e., VOC emissions) away from the control device to the atmosphere, the permittee shall maintain the monitoring records specified below for the valve closure monitoring system:
  - a. hourly records of whether the monitoring device was operating and whether a diversion of flow (VOC emissions) to the atmosphere was detected at any time during the hour;
  - b. a record indicating that a monthly inspection of the monitoring device has been done; and
  - c. records of the times and durations of all periods when the monitoring device is not operating or flow (VOC emissions) is diverted to the atmosphere.

- (12) For monthly (or more frequent) inspections of the VOC emission control system and monitoring equipment conducted pursuant to d)(4) above, a record of the results of each inspection.
- (13) All records specified in d)(8) through d)(12) above shall be retained by the permittee for a period of not less than five years and shall be made available to the director or any authorized representative of the director for review during normal business hours.
- (14) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), K011, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
    - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
    - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
  - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
  - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: Toluene

TLV (mg/m<sup>3</sup>): 75.4

Maximum Hourly Emission Rate (lbs/hr): 18.3

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 38

MAGLC (ug/m<sup>3</sup>): 1,795

The permittee, has demonstrated that emissions of Toluene, from emissions unit(s) K011, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

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

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

- (16) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (17) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall submit semiannual compliance status reports no later than thirty calendar days after the end of each six-month period to the appropriate Ohio Environmental Protection Agency district office or local air agency. The first report shall be submitted no later than thirty calendar days after the end of the first six-month period following the compliance date. Subsequent reports shall be submitted no later than thirty calendar days after the end of each six-month period following the first report or no later than thirty calendar days after the end of each six-month period otherwise established within a permit issued for the aerospace manufacturing or rework facility. For each semiannual compliance status report, the permittee shall submit the following information for the six-month period covered by the report:
- a. For any VOC emission control system employed to meet paragraph (D)(2) of OAC rule 3745-21-19, any changes to monitoring devices previously reported and required under paragraph (G) of OAC rule 3745-21-19.
  - b. If any subsequent compliance tests of the VOC emission control system are conducted during the semiannual reporting period after the initial compliance status report has been submitted, the semiannual compliance status report

shall include the results of each compliance test, a complete test report, and the compliance test monitoring data as described under paragraphs (K)(2)(c)(iii) to (K)(2)(c)(v) of OAC rule 3745-21-19.

c. Compliance certification for semiannual reporting period.

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

- i. For any coating operation that is equipped with a VOC emission control system to comply with paragraph (D)(2) of OAC rule 3745-21-19:
  - (a) The compliance certification shall state that the three-hour block averages of the monitoring parameters recorded pursuant to paragraph (K)(5) of OAC rule 3745-21-15 had complied with the operating limits (operating parameter values) for the monitoring parameters established under paragraph (J)(2) of OAC rule 3745-21-15 during of all periods of operation of the coating operation in the semiannual reporting period; or should otherwise identify the times and durations of all periods of noncompliance and the reasons for noncompliance.
  - (b) The compliance certification shall identify the times and durations of all periods during coating operation or control operation when the monitoring device is not working, as recorded pursuant to paragraph (J)(4) of OAC rule 3745-21-19 and paragraph (K)(5) of rule 3745-21-15 of the Administrative Code.
  - (c) For any capture system bypass line, the compliance certification shall identify the times and durations of all periods in which the captured VOC emissions were discharged to atmosphere instead of a control device, as recorded pursuant to paragraph (J)(4) of OAC rule 3745-21-19 and paragraph (K)(5)(f) of rule 3745-21-15 of the Administrative Code, and the reasons for the discharges to atmosphere.
  - (d) The compliance certification shall state that the overall reduction and control of VOC emissions, based on the most recent compliance test conducted in accordance with paragraph (I) of OAC rule 3745-21-19, has met the requirements under paragraph (D)(2) of OAC rule 3745-21-19 for each coating designated for control during the semiannual reporting period, or should otherwise identify the periods of noncompliance and the reasons for noncompliance.
- ii. The compliance certification shall identify and describe any corrective actions considered and implemented for any noncompliance being reported in the compliance certification.

- iii. The compliance certification shall be signed by the responsible official of a Title V facility, as defined in OAC rule 3745-77-01 or the signatory authority under OAC rule 3745-31-02 for a facility that is not Title V, that owns or operates the aerospace manufacturing or rework facility.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
  - (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
  - (4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitations:

The thermal oxidizer shall achieve a control (destruction) efficiency which is at least 96 percent, by weight, for VOC.

The overall control efficiency shall be at least 95 percent, by weight, for VOC.

Applicable Compliance Method:

Compliance with the control (destruction) efficiency, shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4, and 18 or 25/25A, as appropriate, of 40 CFR Part 60, Appendix A.

[Emission testing for the control efficiency was conducted on December 4, 2014.]

Compliance with overall control efficiency shall be demonstrated based on the results of capture efficiency testing conducted in accordance with f)(2) below and the previous results of control efficiency testing.

- (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 3 months after start-up.
  - b. The emission testing shall be conducted to determine the capture efficiency.
  - c. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
  - 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.



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- 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.

g) Miscellaneous Requirements

- (1) None.