Ohio Environmental Protection Agency

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

10/5/2015

Certified Mail

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

Mr. Andrew Shepherd
Bridgestone APM Co.- AVD Plant
235 Commerce Way
Upper Sandusky, OH 43351

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0388010047
Permit Number: P0119289
Permit Type: Initial Installation
County: Wyandot

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: U.S. EPA
Ohio EPA-NWDO; Michigan; Canada

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Bridgestone APM Co.- AVD Plant

Facility ID:	0388010047
Permit Number:	P0119289
Permit Type:	Initial Installation
Issued:	10/5/2015
Effective:	10/5/2015

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Bridgestone APM Co.- AVD Plant

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Authorization

Facility ID:	0388010047
Facility Description:	Bonded rubber to metal anti-vibration parts for the automotive industry
Application Number(s):	A0053763
Permit Number:	P0119289
Permit Description:	Installation of a new surface coating line - misc. metal parts
Permit Type:	Initial Installation
Permit Fee:	$200.00
Issue Date:	10/5/2015
Effective Date:	10/5/2015

This document constitutes issuance to:

Bridgestone APM Co.- AVD Plant
235 Commerce Way
Upper Sandusky, OH 43351

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0119289
Permit Description: Installation of a new surface coating line - misc. metal parts

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

Emissions Unit ID:	**K015**
Company Equipment ID:	Bond Line # 12
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

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

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

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

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

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

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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

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

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

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

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

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

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

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

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

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

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

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

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

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

10. Applicability

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

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

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

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

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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

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.

C. Emissions Unit Terms and Conditions

1. K015, Bond Line # 12

Operations, Property and/or Equipment Description:

Surface Coating Unit - misc. metal parts

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(F)	2.35 pounds volatile organic compounds (VOC) per gallon solids (daily average), from coating operations [See b)(2)a.] Cleanup operations – work practice standards [See b)(2)a. and c)(2).]
b.	40 CFR Part 63, Subpart MMMM (40 CFR 63.3880 et seq.) [In accordance with 40 CFR 63.3881, this emissions unit is a general use coating source at a miscellaneous metal parts and products surface coating facility.]* *The company has chosen to comply with the emission limitation for new or reconstructed general use coating sources.	<u>63.3890(a)(1):</u> 1.9 lb organic HAP emissions per gallon of coating solids (12-month rolling compliance period) See b)(2)b. through b)(2)e., c)(1), d(2), and e)(3).
c.	40 CFR 63.1-15 (40 CFR 63.3901)	Table 2 to Subpart MMMM of 40 CFR Part 63 - Applicability of General Provisions to Subpart MMMM shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
d.	OAC rule 3745-21-09(U)(1)(d)	6.7 lbs VOC per gallon of solids, from coating operations See b)(2)f.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(C)	See c)(4) and c)(5).
f.	OAC rule 3745-31-05(A)(3) June 30, 2008	See b)(2)g.
g.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See b)(2)h.

(2) Additional Terms and Conditions

a. This permit establishes a legally and practically enforceable emission limitation for VOC. The legally and practically enforceable emission limitation is a voluntary restriction established under OAC rule 3745-31-05(F) and is based on a VOC emission standard reflecting the application of control and/or the use of low VOC-content materials.

Emissions unit K015 involves the coating of metal parts in an adhesive primer /topcoat system. VOC emissions are vented to a regenerative thermal oxidizer (RTO) control system. A capture and destruction efficiency achievable from the use of an RTO was applied to the VOC contents and maximum application rates of materials employed to establish an emission standard of:

i. 2.35 lb VOC /gal solids from coating operations

The potential to emit for VOC from emissions unit is based on the lb VOC /gal solids emission standard and results in a potential of 5.49 tons per year and was determined by the following calculation:

2.35 lb VOC(1)	0.533 gal solids(2)	8760 hours(3)	1 ton(4)
gal solids	hour	year	2000 lbs

where:

(1) enforceable VOC emission standard
(2) maximum solids application rate
(3) maximum annual operating schedule
(4) conversion factor

Operations in emissions unit K015 also involve the use of VOC containing material for cleanup. Cleanup operations generate a negligible level of VOC emissions and therefore, a VOC emission limitation has not been established. Cleanup operations are conducted within the booth enclosure and mainly involve the cleaning of coating application equipment through purging. The requirement to apply work practice standards [see c)(3)] will ensure cleanup operations generate only negligible emissions.

b. The permittee shall demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in this emissions units and the

emissions reductions achieved by emission capture systems and add-on controls, the organic HAP emission rate for the emissions unit is less than or equal to the applicable emission limit in b)(1)b., calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee must also demonstrate that all emission capture systems and add-on control devices for this emissions unit meets the operating limits required in c)(1), except for solvent recovery systems for which the permittee conducts liquid-liquid material balances according to 40 CFR 63.3961(j), and that the permittee meet the work practice standards required in c)(2). The permittee must meet all the requirements of f)(2) to demonstrate compliance with the emission limits, operating limits, and work practice standards.
[40 CFR 63.3891(c)]

c. The permittee must be in compliance with the applicable emission limitations as follows:

   i. The emissions unit must be in compliance with the applicable emission limitation in b)(1)b. at all times except during periods of startup, shutdown, and malfunction.

   ii. The emissions unit must be in compliance with the operating limits for emission capture systems and add-on control devices required in c)(1) at all times except during periods of startup, shutdown, and malfunction, and except for solvent recovery systems for which the permittee conducts liquid-liquid material balances according to 40 CFR 63.3961(j).

   iii. The emissions units must be in compliance with the work practice standards in c)(2) at all times.

   [40 CFR 63.3900 (a)(2)]

d. The permittee must always operate and maintain the emissions unit, including all air pollution control and monitoring equipment used for purposes of complying with 40 CFR, Part 63, Subpart MMMM, according to the provisions in 40 CFR 63.6(e)(1)(i).
[40 CFR 63.3900 (b)]

e. Since an emission capture system and add-on control device is used, the permittee must develop a written startup, shutdown, and malfunction plan according to the provisions in 40 CFR 63.6(e)(3). The plan must address the startup, shutdown, and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The plan must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.
[40 CFR 63.3900(c)]

f. The requirement established under OAC rule 3745-21-09(U)(1)(d) of (since a control system is employed) 6.7 pounds of VOC per gallon of solids (for any coating that is dried at temperatures not exceeding two hundred degrees

Fahrenheit) is less stringent than the requirement established under OAC rule 3745-31-05(F).

g. The Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F). This requirement applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by the U.S. EPA.

h. The BAT requirements do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate is less than 10 tons per year taking into account the voluntary restriction from OAC rule 3745-31-05(F).

These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the SIP.

c) Operational Restrictions

(1) During the most recent performance test (August 23, 2012) required by 40 CFR 63.3960 and described in 40 CFR 63.3964, 63.3965, and 63.3966, the permittee established the operating limits required by 40 CFR 63.3892(b), as follows:

a. The minimum combustion temperature operating limit for the (primary) thermal oxidizer has been determined to be 1661 °F. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit.

Except where using a solvent recovery system and conducting a liquid-liquid material balance according to 40 CFR 63.3961(j), the permittee must meet the operating limit specified above at all times.

(2) The permittee must develop and implement (or must have developed and implemented) a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s) for which you use this option; or the permittee must meet an alternative standard as provided in 40 CFR 63.3893(c). The plan must specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

a. All organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.

b. Spills of organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.

c. Organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.

d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.

e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.

(3) The permittee shall employ the following work practice standards for cleanup operations for this emissions unit:

a. all cleanup operations shall be performed within the spray booth enclosure system and may only be conducted when the spray booth is being vented to the RTO serving this emissions unit;

b. the VOC-containing material employed shall be reclaimed and placed into containers with tight fitting lids before they are transported to the reclaim area; and

c. all reclaimed VOC-containing material shall be stored in closed containers except during the addition and/or removal of material.

(4) The permittee shall operate the dry filtration system for the control of particulate emissions whenever the spray equipment of this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(5) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

d) Monitoring and/or Recordkeeping Requirements

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

63.3968(a)(1) through (6)	operating requirements (general) for Continuous Parameter Monitoring Systems (CPMS)
63.3968(a)(7)	definition of monitoring malfunction
63.3968(b)	capture system bypass line monitoring
63.3968(c)	thermal oxidizer monitor specifications
63.3968(f)	gas concentrator specifications
63.3968(g)	Permanent Total Enclosure (PTE) capture system monitoring (see Table 1 Section 6)

63.3930(a)	records (copies) of compliance notification reports
63.3930(b)	current records of coating manufacturer /supplier HAP information
63;3930(c)(1), (2), and (3)	records of calculation(s) for compliance
63.3930(d), (e), (f), and (g)	records of coating material types and volumes used, and HAP and solids content, and density (as applicable)
63.3930(j)	deviation records retention
63.3930(k)(1)	deviation records for add-on controls
63.3930(k)(2)	startup, shutdown, and malfunction records
63.3930(k)(3)	operating limit continuous compliance records
63.3930(k)(4)	PTE criteria determination documentation
63.3930(k)(6) and (7)	control device performance test records
63.3930(k)(8)	work practice plan records
63.3991	records retention (general)

(2) The permittee shall collect and record the following information each day for the coating line and control equipment:

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

b. for each coating, the calculation for the VOC content in pounds of VOC per gallon of coating solids and the record of each variable for each coating applied:

$C_{VOC} = (D_C)(W_{VOC}) / V_S$

where:

C_{VOC} = VOC content, in pounds of VOC per gallon of solids

D_C = density of coating, in pounds of coating per gallon of coating

$W_{VOC} = W_{VM} - W_W - W_{ES}$

W_{VM} = weight fraction of VOC in coating, in pound of VOC per pound of coating

W_W = weight fraction of water in coating, in pound of water per pound of coating

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating

V_S = volume fraction of solids in coating, in gallon of solids per gallon of coating;

c. the maximum VOC content per gallon of coating solids for all the coatings applied; or

d. the daily volume weighted average VOC content in pounds of VOC per gallon of coating solids of all the coatings applied, calculated as follows:

$$(C_{VOC})_A = \frac{\sum_{i=1}^{n} C_{VOC,i} L_{Ci} V_{Si}}{\sum_{i=1}^{n} L_{Ci} V_{Si}}$$

where:

$(C_{VOC})_A$ = daily volume weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied)

C_{VOC} = VOC content, in pounds of VOC per gallon of solids

L_C = liquid volume of each coating employed during the day

V_S = volume fraction of solids in coating, in gallon of solids per gallon of coating

i = subscript denoting a specific coating employed during the day or averaging period

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during the day or during the averaging period.

e. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the maximum VOC content of any coating applied or the daily volume weighted average) using the overall control efficiency, as determined for the thermal oxidizer during the most recent emission test that demonstrated that the emissions unit(s) was/were in compliance.

(3) The permittee shall certify each month, in writing, that all cleanup operations are in compliance with the operational restrictions specified in c)(3).

(4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

(8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

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

63.3920(a)(2)	semi-annual reports
63.3920(a)(3)	reporting requirements (general)
63.3920(a)(4), (7)	deviation reporting requirements (general)
63.3920(b)	performance test reports
63.3920(c)	startup, shutdown, malfunction reports

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. <u>Emission Limitation:</u>
2.35 pounds VOC per gallon solids, (daily average), from coating operations

<u>Applicable Compliance Method:</u>
Compliance with the emissions limitation shall be demonstrated in accordance with the record-keeping requirements in d)(2).

b. <u>Emission Limitation:</u>
1.9 lb organic HAP emissions per gallon of coating solids (12-month rolling compliance period)

<u>Applicable Compliance Method:</u>
Compliance with the emissions limitation shall be demonstrated in accordance with the record-keeping requirements in d)(1) and compliance provisions in f)(2).

(2) The permittee shall comply with the applicable compliance requirements as required under 40 CFR, Part 63, Subpart MMMM, including the following sections:

63.3960, 3961, and 3963	compliance requirements for the emission rate with add-on controls option

g) Miscellaneous Requirements

(1) None.