



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

10/21/2015

DAVE STEWART
Worthington Cylinder Corporation
333 MAXTOWN RD
WESTERVILLE, OH 43082

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0121000211
Permit Number: P0118885
Permit Type: OAC Chapter 3745-31 Modification
County: Delaware

Dear Permit Holder:

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

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

How to appeal this permit

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

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

Certified Mail

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

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, Central District Office at (614)728-3778 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: Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Worthington Cylinder Corporation**

Facility ID:	0121000211
Permit Number:	P0118885
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	10/21/2015
Effective:	10/21/2015
Expiration:	6/7/2017



Division of Air Pollution Control
Permit-to-Install and Operate
for
Worthington Cylinder Corporation

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit?	4
3. What records must I keep under this permit?	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application?	4
6. What happens to this permit if my project is delayed or I do not install or modify my source?	5
7. What reports must I submit under this permit?	5
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?	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	7
15. What happens if a portion of this permit is determined to be invalid?	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions	10
1. K001, PB1, PB2, PB01, PB02, C1	11



Final Permit-to-Install and Operate
Worthington Cylinder Corporation
Permit Number: P0118885
Facility ID: 0121000211
Effective Date: 10/21/2015

Authorization

Facility ID: 0121000211
Application Number(s): A0053218
Permit Number: P0118885
Permit Description: Chapter 31 modification to allow for a new coating to be used at the K001 coating line.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$200.00
Issue Date: 10/21/2015
Effective Date: 10/21/2015
Expiration Date: 6/7/2017
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Worthington Cylinder Corporation
333 E MAXTOWN RD
Westerville, OH 43081

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

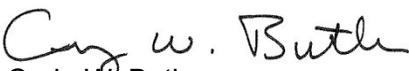
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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



Final Permit-to-Install and Operate
Worthington Cylinder Corporation
Permit Number: P0118885
Facility ID: 0121000211
Effective Date: 10/21/2015

Authorization (continued)

Permit Number: P0118885

Permit Description: Chapter 31 modification to allow for a new coating to be used at the K001 coating line.

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

Emissions Unit ID:	K001
Company Equipment ID:	PB1, PB2, PB01, PB02, C1
Superseded Permit Number:	P0110316
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Worthington Cylinder Corporation
Permit Number: P0118885
Facility ID: 0121000211
Effective Date: 10/21/2015

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Again, you cannot resume operation of any emissions unit certified by the authorized official as 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.



Final Permit-to-Install and Operate
Worthington Cylinder Corporation
Permit Number: P0118885
Facility ID: 0121000211
Effective Date: 10/21/2015

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate
Worthington Cylinder Corporation
Permit Number: P0118885
Facility ID: 0121000211
Effective Date: 10/21/2015

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) None.



Final Permit-to-Install and Operate
Worthington Cylinder Corporation
Permit Number: P0118885
Facility ID: 0121000211
Effective Date: 10/21/2015

C. Emissions Unit Terms and Conditions

1. K001, PB1, PB2, PB01, PB02, C1

Operations, Property and/or Equipment Description:

Powder coating and wet coating line

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. b)(1)d. and d)(1)i
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)e., d)(3)a.-i., and e)(2)
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (Established by PTI 01-5128, issued final 10/26/1994)	Emissions from particulate matter (PM) shall not exceed: 0.381 pound per hour (lb/hr) and 1.67 ton per year(tpy); Emissions from sulfur dioxide (SO ₂) shall not exceed: 0.005 lb/hr and 0.022 tpy; Emissions from nitrogen oxides (NO _x) shall not exceed: 0.82 lb/hr and 3.59 tpy; and Emissions from carbon monoxide (CO) shall not exceed:

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.164 lb/hr and 0.72 tpy See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)	Emissions from volatile organic compounds (VOC) shall not exceed: 0.68 tons VOC per month averaged over a twelve-month rolling period. See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to VOC from this air contaminant source since the calculated annual emission rate is less than 10 tons/yr taking into account the voluntary restriction from OAC rule 3745-31-05(E). See b)(2)c. below.
d.	OAC rule 3745-31-05(E)	K001 shall not use more than 4657 gallons of coating per rolling, 12-month period.
e.	OAC rule 3745-31-05(D) (Synthetic minor to avoid NSR and Title V)	The combined total hazardous air pollutants (HAP) emissions shall not exceed 9.9 tons per rolling 12-month period for any single HAP and 24.9 tons per rolling 12-month period for all HAPs from all coating and cleanup materials.
f.	OAC rule 3745-21-09(U)	See b)(2)d.
g.	OAC rule 3745-17-11(C)	See b)(2)e., c)(1), d)(4) – (7)

(2) Additional Terms and Conditions

- a. The hourly and annual emission limitations for PM, SO₂, NO_x, and CO were established to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop monitoring, recordkeeping and/or reporting requirements to ensure compliance with this limit.
- b. This Best Available Technology (BAT) emission limit 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)
- c. 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 Ohio SIP.

- d. The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 pounds per gallon, as applied, excluding water and exempt solvents; and the coatings shall not be dried at temperatures that exceed 200 degrees Fahrenheit.
 - e. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.
- c) Operational Restrictions
- (1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever 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.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:
 - a. the number of gallons of each coating applied or the number of gallons of all coatings applied during the month;
 - b. the maximum VOC content (excluding water and exempt solvents) of each coating applied; or the maximum VOC content (excluding water and exempt solvents) for any coating applied, in pounds per gallon, as calculated for $C_{VOC,2}$ above;
 - c. the total VOC emissions from all coatings applied, i.e., the summation of the products of "a" times "b" for all the individual coatings applied during the month; or the product of the maximum VOC content of any coating applied times the total gallons of coating employed during the month, i.e., "a" times "b" for worst case coating;
 - d. the name and identification of each cleanup material employed;
 - e. the VOC content of each cleanup material, in pounds per gallon;
 - f. the number of gallons of each cleanup material employed;
 - g. the total VOC emission rate from all cleanup materials, in pounds or tons, i.e., the summation of the products of "e" times "f" for all cleanup materials employed; and
 - h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, the sum of "c" and "g";
 - i. the rolling, 12-month total of coating applied in gallons; and
 - j. the tons VOC emissions per month averaged over a twelve-month rolling period.

- (2) The permittee shall collect and record the following information each month for the coating or printing line:
- a. the name and identification number of each coating, as applied;
 - b. the mass of VOC per volume of each coating, excluding water and exempt solvents, as applied;
 - c. the volume of each coating, excluding water and exempt solvents, as applied; and
 - d. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in OAC 3745-21-10(B)(9) for $C_{VOC,2}$.
- (3) The permittee shall collect and record the following information each month.
- a. the individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - b. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from b);
 - c. the number of gallons of each coating employed;
 - d. the name and identification of each cleanup/solvent material employed;
 - e. the individual HAP content of each HAP of each cleanup/solvent material in pounds of individual HAP per gallon cleanup/solvent material, as applied;
 - f. the total combined HAP content of each cleanup/solvent material in pounds of combined HAPs per gallon of cleanup/solvent material, as applied (sum of all individual HAP contents from e.)
 - g. the number of gallons of each cleanup/solvent material employed;
 - h. the total individual HAP emissions for each HAP from all coating and cleanup/solvent material in pounds or tons per rolling, 12-month period (for each HAP the sum of a. times c. for each coating and the sum of e. times g. for each cleanup/solvent material); and
 - i. The total combined HAP emissions from all coating and cleanup/solvent materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of b. times c. for each coating plus the sum of f. times g. for each cleanup/solvent material).

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 field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvent contained in

the interior coatings or clean materials. This information does not have to be kept on a line by line basis.

- (4) 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.
- (5) 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.
- (6) 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.

- (7) 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 notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
 - (2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:



- a. the rolling, 12-month total individual HAP emission; and
- b. the rolling, 12-month total combined HAPs emission limitation.

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, electronically through Ohio EPA Air Services, 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).

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

- a. Emission Limitation

0.381 lb PM/hr and 1.67 tpy;

0.005 lb SO₂/hr and 0.022 tpy;

0.82 lb NO_x /hr and 3.59 tpy; and

0.164 lbs CO/hr and 0.72 tpy.

- Applicable Compliance Method

If required, the permittee shall demonstrate compliance with the PM emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 1-5.

If required, the permittee shall demonstrate compliance with the SO₂ emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C.

If required, the permittee shall demonstrate compliance with the NO_x emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

If required, the permittee shall demonstrate compliance with the CO emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760 hrs/yr, and dividing by 2000 lbs/ton).

b. Emission Limitation

VOC emissions shall not exceed: 0.68 tons VOC per month averaged over a twelve-month rolling period.

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in Section d)(1). If required, the permittee shall demonstrate compliance with the VOC emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A.

c. Emission Limitation

3.5 lbs VOC/gal of all coatings (excluding water and exempt solvents)

Applicable Compliance Method

Compliance shall be based upon the record keeping specified in d)(2). The mass of VOC per volume of each coating, excluding water and exempt solvents, as applied, shall be calculated as follows:

$C_{VOC,2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents.

$$C_{VOC,2} = (D_C)(W_{VOC}) / (V_S + V_{VOC})$$

where:

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

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

V_S = volume fraction of solids (nonvolatile matter) in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter 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_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular interior coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that interior coating to demonstrate compliance until USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

d. Emission Limitation

The individual HAP emissions shall not exceed 9.9 tons per rolling, 12-month period for all single HAP from all coatings and cleanup materials used.

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements in Section d)(3)h.

e. Emission Limitation

The combined total HAPs emissions shall not exceed 24.9 tons per rolling, 12-month period for all HAPs.

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements in Section d)(3)i.

g) Miscellaneous Requirements

- (1) None.