



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

10/28/2015

Genevieve Damico *Via E-Mail Notification*  
United States Environmental Protection Agency  
Mail Code: AR-18J  
77 West Jackson Blvd.  
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT  
Facility Name: Ventra Salem, LLC  
Facility ID: 0215090195  
Permit Type: Renewal  
Permit Number: P0118850

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. 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. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-2835 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

A handwritten signature in black ink that reads "Michael E. Hopkins". The signature is written in a cursive style.

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

Cc: Ohio EPA DAPC, Northeast District Office





## **PROPOSED**

# **Division of Air Pollution Control Title V Permit for Ventra Salem, LLC**

Facility ID:	0215090195
Permit Number:	P0118850
Permit Type:	Renewal
Issued:	10/28/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
Ventra Salem, LLC

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**Proposed Title V Permit**  
Ventra Salem, LLC  
**Permit Number:** P0118850  
**Facility ID:** 0215090195

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

## Authorization

Facility ID: 0215090195  
Facility Description: injected automotive plastic parts  
Application Number(s): A0053054  
Permit Number: P0118850  
Permit Description: Title V renewal permit for an injected automotive plastic parts plant.  
Permit Type: Renewal  
Issue Date: 10/28/2015  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0116048

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

Ventra Salem, LLC  
800 PENNSYLVANIA AVE.  
Salem, OH 44460-2780

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

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)963-1200

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



**Proposed Title V Permit**  
Ventra Salem, LLC  
**Permit Number:** P0118850  
**Facility ID:** 0215090195  
**Effective Date:** To be entered upon final issuance

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

**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
  - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
  - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
  - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (5) Standard Term and Condition A. 30.

*(Authority for term: ORC 3704.036(A))*

**2. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.

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

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

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

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

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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

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

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

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

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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

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

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

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

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

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

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

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

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

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

#### **4. Risk Management Plans**

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

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

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

#### **5. Title IV Provisions**

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

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

#### **6. Severability Clause**

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

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

#### **7. General Requirements**

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.

- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
  - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

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

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

## **8. Fees**

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

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

## **9. Marketable Permit Programs**

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

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

**10. Reasonably Anticipated Operating Scenarios**

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

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

**11. Reopening for Cause**

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

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

**12. Federal and State Enforceability**

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

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

**13. Compliance Requirements**

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

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

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - (2) Compliance certifications shall include the following:
    - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
    - b. The permittee's current compliance status.

- c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
  - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
  - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

#### **14. Permit Shield**

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

#### **15. Operational Flexibility**

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

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

## **16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

## **17. Off-Permit Changes**

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

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

## **18. Compliance Method Requirements**

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

*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

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

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

**20. Permit to Install Requirement**

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

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

**21. Air Pollution Nuisance**

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

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

**22. Permanent Shutdown of an Emissions Unit**

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

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

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

**23. Title VI Provisions**

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

- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

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

The permittee shall submit required reports in the following manner:

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

**25. Records Retention Requirements Under State Law Only**

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

**26. Inspections and Information Requests**

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



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

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

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

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

**28. Permit Transfers**

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

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

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

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

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

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



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**30. Submitting Documents Required by this Permit**

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northeast District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



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



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

a) None.

2. The following emission units contained in this permit are subject to 40 CFR Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products: P001, P005 - P007, P063 - P065, P074, P086 - P089, P094, P095, R001 - R003, R004, R006, R010, R014 - R016, R018, R019, R023 - R028, R033 - R035 and R037 - R046. The complete NESHAP requirements, including the NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District office.

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

3. The permittee must limit organic HAP emissions to the atmosphere from the affected source (emissions units listed above) to the applicable limit specified in paragraphs a) through d) of this section, determined according to the requirements in §63.4561.

a) For each existing general use coating affected source, limit organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

b) For each existing automotive lamp coating affected source, limit organic HAP emissions to no more than 0.45 kg (0.45 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

c) For each existing TPO (thermoplastic olefin) coating affected source, limit organic HAP emissions to no more than 0.26 kg (0.26 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

d) For each existing assembled on-road vehicle coating affected source, limit organic HAP emissions to no more than 1.34 kg (1.34 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

4. The permittee shall comply with the applicable emissions and operating limitations under 40 CFR Part 63, Subpart PPPP, including the following sections:

63.4490(a)(1)	Emissions limitation for each new general use coating affected source
63.4491(a)	Compliant material option
63.4491(c)	Emission rate with add-on controls option



63.4492(b) and Table 1	Operating limits
63.4493(b)	Work practice standards
63.4500(a)(2), (b) and (c)	General requirements

5. The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart PPPP, including the following sections:

63.4530(a)	Copy of each notification and report submitted and all supporting documentation
63.4530(b)	A current copy of information provided by materials suppliers or manufacturers
63.4530(c)	Coating operations and chosen compliance option for each compliance period
63.4530 (d)-(g)	Coating records maintained
63.4531(a)-(c)	Record keeping format and retention requirements

6. The permittee shall submit semi-annual reports and such other notifications and reports to the Northeast District Office of the Ohio EPA as are required in 40 CFR Part 63, Subpart PPPP, pursuant to the following sections:

63.4510(a)	General notifications
63.4510(b)	Initial notification
63.4510(c)	Notification of compliance status
63.4520(a)	Semiannual compliance reports

7. The permittee shall comply with the applicable compliance procedures and performance test methods as required under 40 CFR Part 63, Subpart PPPP, including the following sections:

63.4540	Initial compliance demonstration date for compliant material option
63.4560	Initial compliance demonstration date for emission rate with add-on controls option

63.4541	Initial compliance demonstration for compliant material option
63.4561	Initial compliance demonstration for emission rate with add-on controls option
63.4542	Continuous compliance demonstration for compliant material option
63.4563	Continuous compliance demonstration for emission rate with add-on controls option
63.4564	General requirements for performance tests
63.4565	Determining the emission capture system efficiency
63.4566	Determining the add-on control device emission destruction or removal efficiency
63.4567	Establishing the emission capture system and add-on control device operating limits
63.4568(a), (b), (c), and (g)	Requirements for continuous parameter monitoring system installation, operation, and maintenance

8. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

[OAC rule 3745-17-11(C)]

9. The permittee shall operate a dry filtration system for the control of particulate emissions whenever the following emissions units are 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: R001 - R003, R004, R006, R010, R014 - R016, R018, R019, R023 - R028, R033 - R035 and R037 - R046.

[OAC rule 3745-17-11(C)(1) and (2)(b) and OAC rule 3745-77-07(C)(1)]

10. 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.

[OAC rule 3745-17-11(C)(2)(e), OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(C)(1)]

11. 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 Ohio EPA Northeast District Office upon request.

[OAC rule 3745-17-11(C)(2)(a) and OAC rule 3745-77-07(C)(1)]

12. 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.

[OAC rule 3745-17-11(C)(2)(c) and OAC rule 3745-77-07(C)(1)]

13. 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.

[OAC rule 3745-17-11(C)(2)(c) and OAC rule 3745-77-07(C)(1)]

14. 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 Ohio EPA Northeast District Office upon request.

[OAC rule 3745-17-11(C)(2)(d) and (f) and OAC rule 3745-77-07(C)(1)]

15. 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.

[OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1) and OAC rule 3745-77-07(C)(1)]

16. The permittee shall submit quarterly deviation (excursion) reports that include any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.



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[OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C); and OAC rule 3745-77-07(C)(1)]

17. Air contaminant sources that qualify as de minimis under OAC rule 3745-15-05, or are exempt under OAC rule 3745-31-03(A)(1) or (4) are not subject to emission standards established within this permit. Although this permit does not apply to de minimis or exempt sources, emissions from de minimis or exempt sources must be included in the total potential to emit (PTE) calculations for this permit.
18. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, and/or 40 CFR Part 60 or 63:
  - a) N001 – 30 lbs/hr paint burn off oven equipped with an afterburner (PTI P0117615).



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



**1. R018, P-14**

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

P-14 Paint Spray Booth

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 operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI 02-17288]	Volatile organic compound (VOC) emissions shall not exceed 20.0 pounds per hour.
b.	OAC rule 3745-31-05(D) [PTI 02-17288]	VOC emissions shall not exceed 6.83 tons per rolling, 12-month period, including cleanup materials. See c)(1).
c.	OAC rule 3745-17-11(C)	See B.8 through B.16.
d.	40 CFR Part 63, Subpart PPPP  [In accordance with 40 CFR Part 63, Subpart PPPP, this emissions unit is an existing coating operation at a surface coating of plastic parts and products operation and subject to the emissions limitations and work practice standards specified in this subpart.]	See B.2 through B.7.
e.	40 CFR Part 63, Subpart A (63.1 through 63.15)	Table 2 to Subpart PPPP of 40 CFR Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) The maximum VOC usage shall not exceed 6.83 tons based upon a rolling, 12-month summation of the volatile organic material figures.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-17288]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each day to determine compliance with the hourly emission limitation specified in b)(1)a.:

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the VOC content of each coating and cleanup material, in pounds per gallon;
- d. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
- e. the VOC emission rate for all coatings, in pounds per day, calculated as the summation of b. x c. for each coating and clean-up material employed – d.
- f. the total number of hours the emissions unit was in operation; and
- g. the average hourly VOC emission rate for all coatings, i.e., e./f., in pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-17288]

- (2) The permittee shall record the following information for each month to determine compliance with the emission limitation specified in b)(1)b.:

- a. the name or identification of each coating and cleanup material employed;
- b. the VOC content of each coating and cleanup material as employed, in pounds per gallon;
- c. the amount of each coating and cleanup material employed, in gallons;
- d. the pounds VOC emitted from the use of each coating and cleanup material, calculated as b. x c. for each material employed;
- e. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
- f. the total VOC emission rate, in pounds per month, calculated as the summation of d. for each material minus e.; and

- g. the VOC emissions over the most recent 12-month period, calculated by summing the tons VOC emitted over the most recent 12 months.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D) and PTI 02-17288]

- (3) Formulation data or USEPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-17288]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a. each day during which the VOC emissions exceeded 20 pounds per hour, and the actual hourly VOC emissions for each such day; and
- b. each month during which the rolling, 12-month VOC emissions exceeded 6.83 tons, and the actual VOC emissions for each such rolling, 12-month period.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-17288]

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:

VOC emissions shall not exceed 20.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-17288]

- b. Emission Limitation:

VOC emissions shall not exceed 6.83 tons per rolling, 12-month period, including cleanup materials.



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Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-17288]

g) Miscellaneous Requirements

(1) None.



**2. R028, P-30A**

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

P-30A Paint Spray Booth

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 operations(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. 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) and OAC rule 3745-31-05(A)(3) [PTI P0118788]	Volatile organic compound (VOC) emissions shall not exceed 1.025 tons/month averaged over a 12-month rolling period.
b.	OAC rule 3745-17-11(C)	See B.8 through B.16.
c.	40 CFR Part 63, Subpart PPPP  [In accordance with 40 CFR Part 63, Subpart PPPP, this emissions unit is an existing coating operation at a surface coating of plastic parts and products operation and subject to the emissions limitations and work practice standards specified in this subpart.]	See B.2 through B.7.
d.	40 CFR Part 63, Subpart A (63.1 through 63.15)	Table 2 to Subpart PPPP of 40 CFR Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month to determine compliance with the emission limitation specified in b)(1)a.:
  - a. the name or identification of each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material as employed, in pounds per gallon;
  - c. the amount of each coating and cleanup material employed, in gallons;
  - d. the pounds VOC emitted from the use of each coating and cleanup material, calculated as  $b. \times c.$  for each such material employed;
  - e. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
  - f. the total VOC emission rate, in pounds per month, calculated as the summation of d. for each material minus e.;
  - g. the VOC emissions over the most recent 12-month period, calculated by summing the tons VOC emitted over the most recent 12 months; and
  - h. the total VOC emission rate, in tons/month averaged over a 12-month rolling period, calculated by g. divided by 12.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0118788]

- (2) Formulation data or USEPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0118788]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. each month during which the rolling, 12-month VOC emissions exceeded 1.025 tons/month, and the actual VOC emissions for each such rolling, 12-month period.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0118788]



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:

VOC emissions shall not exceed shall not exceed 1.025 tons/month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0118788]

g) Miscellaneous Requirements

(1) None.



**3. R033, V-9**

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

V-9 Paint Spray Booth

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 operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI 17-426]	Volatile organic compound (VOC) emissions shall not exceed 41.6 tons per year.
b.	OAC rule 3745-17-11(C)	See B.8 through B.16.
c.	40 CFR Part 63, Subpart PPPP  [In accordance with 40 CFR Part 63, Subpart PPPP, this emissions unit is an existing coating operation at a surface coating of plastic parts and products operation and subject to the emissions limitations and work practice standards specified in this subpart.]	See B.2 through B.7.
d.	40 CFR Part 63, Subpart A (63.1 through 63.15)	Table 2 to Subpart PPPP of 40 CFR Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month to determine compliance with the emission limitations specified in b)(1)a.:
  - a. the company identification for each coating employed;
  - b. the number of gallons of each coating employed;
  - c. the VOC content of each coating, in pounds per gallon;
  - d. the amount of VOC disposed off-site, as documented in the manifests, in pounds; and
  - e. the VOC emission rate for all coatings, in pounds per month, calculated as the summation of b. x c. for each coating employed – d.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 17-426]

- (2) Formulation data or USEPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 17-426]

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 17-426, issued on April 8, 1987: d)(1) and d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) None.

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions shall not exceed 41.6 tons per year.



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Applicable Compliance Method:

Compliance shall be demonstrated based upon the summation of the record keeping requirement specified in d)(1)e. for the calendar year and then dividing by 2000 lbs/ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 17-426]

- (2) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 17-426, issued on April 8, 1987: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

- (1) None.



**4. R034, P-40**

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

P-40 Paint Spray Booth

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 operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI 17-631]	Organic compound (OC) emissions shall not exceed 3.63 pounds per hour.
b.	OAC rule 3745-17-11(C)	See B.8 through B.16.
c.	40 CFR Part 63, Subpart PPPP  [In accordance with 40 CFR Part 63, Subpart PPPP, this emissions unit is an existing coating operation at a surface coating of plastic parts and products operation and subject to the emissions limitations and work practice standards specified in this subpart.]	See B.2 through B.7.
d.	40 CFR Part 63, Subpart A (63.1 through 63.15)	Table 2 to Subpart PPPP of 40 CFR Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each day to determine compliance with the emission limitations specified in b)(1)a.:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the OC content of each coating and cleanup material, in pounds per gallon;
  - d. the amount of OC disposed off-site, as documented in the manifests, in pounds;
  - e. the OC emission rate for all coatings, in pounds per day, calculated as the summation of b. x c. for each coating employed – d.;
  - f. the total number of hours the emissions unit was in operation; and
  - g. the average hourly OC emission rate for all coatings, i.e., e./f., in pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 17-631]

- (2) Formulation data or USEPA Method 24 (for coatings) shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 17-631]

- (3) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 17-631, issued on November 2, 1988: d)(1) and d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the average OC emissions from the coatings exceeded 3.63 pounds per hour, and the actual OC emissions for each such day.



The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 17-631]

- (2) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 17-631, issued on November 2, 1988: e)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

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:

Emissions of OC shall not exceed 3.63 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 17-631]

- (2) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 17-631, issued on November 2, 1988: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

g) Miscellaneous Requirements

- (1) None.



5. R039, P-43

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

P-43 Paint Spray Booth

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 operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI 02-16803]	Volatile organic compound (VOC) emissions shall not exceed 20.0 pounds per hour.
b.	OAC rule 3745-31-05(D) [PTI 02-16803]	VOC emissions shall not exceed 5.0 tons per rolling, 12-month period, including cleanup materials. See c)(1).
c.	OAC rule 3745-17-11(C)	See B.8 through B.16.
d.	40 CFR Part 63, Subpart PPPP  [In accordance with 40 CFR Part 63, Subpart PPPP, this emissions unit is an existing coating operation at a surface coating of plastic parts and products operation and subject to the emissions limitations and work practice standards specified in this subpart.]	See B.2 through B.7.
e.	40 CFR Part 63, Subpart A (63.1 through 63.15)	Table 2 to Subpart PPPP of 40 CFR Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) The maximum VOC usage shall not exceed 5.0 tons based upon a rolling, 12-month summation of the volatile organic material employed.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-16803]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each day to determine compliance with the emission limitations specified in b)(1)a.:

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the VOC content of each coating and cleanup material, in pounds per gallon;
- d. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
- e. the VOC emission rate for all coatings, in pounds per day, calculated as the summation of b. x c. for each coating employed – d.;
- f. the total number of hours the emissions unit was in operation; and
- g. the average hourly VOC emission rate for all coatings, i.e., e./f., in pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

- (2) The permittee shall record the following information for each month to determine compliance with the emission limitation specified in b)(1)b.:

- a. the name or identification of each coating and cleanup material employed;
- b. the VOC content of each coating and cleanup material as employed, in pounds per gallon;
- c. the amount of each coating and cleanup material employed, in gallons;
- d. the pounds VOC emitted from the use of each coating and cleanup material, calculated as b. x c. for each such material employed;
- e. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
- f. the total VOC emission rate, in pounds per month, calculated as the summation of d. for each material minus e.; and



- g. the VOC emissions over the most recent 12-month period, calculated by summing the tons VOC emitted over the most recent 12 months.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D) and PTI 02-16803]

- (3) Formulation data or USEPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a. each day during which the VOC emissions exceeded 20 pounds per hour, and the actual hourly VOC emissions for each such day; and
- b. each month during which the rolling, 12-month VOC emissions exceeded 5.0 tons, and the actual VOC emissions for each such rolling, 12-month period.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

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:

VOC emissions shall not exceed 20.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

- b. Emission Limitation:

VOC emissions shall not exceed 5.0 tons per rolling, 12-month period, including cleanup materials.



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Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

g) Miscellaneous Requirements

(1) None.



6. R041, P-45

Operations, Property and/or Equipment Description:

P-45 Paint Spray Booth

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 operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI 02-16803]	Volatile organic compound (VOC) emissions shall not exceed 20.0 pounds per hour.
b.	OAC rule 3745-31-05(D) [PTI 02-16803]	VOC emissions shall not exceed 10.0 tons per rolling, 12-month period, including cleanup materials. See c)(1).
c.	OAC rule 3745-17-11(C)	See B.8 through B.16.
d.	40 CFR Part 63, Subpart P  [In accordance with 40 CFR Part 63, Subpart P, this emissions unit is an existing coating operation at a surface coating of plastic parts and products operation and subject to the emissions limitations and work practice standards specified in this subpart.]	See B.2 through B.7.
e.	40 CFR Part 63, Subpart A (63.1 through 63.15)	Table 2 to Subpart P of 40 CFR Part 63 – Applicability of General Provisions to Subpart P shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) The maximum VOC usage shall not exceed 10.0 tons based upon a rolling, 12-month summation of the volatile organic material employed.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-16803]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each day to determine compliance with the emission limitations specified in b)(1)a.:

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the VOC content of each coating and cleanup material, in pounds per gallon;
- d. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
- e. the VOC emission rate for all coatings, in pounds per day, calculated as the summation of b. x c. for each coating employed – d.;
- f. the total number of hours the emissions unit was in operation; and
- g. the average hourly VOC emission rate for all coatings, i.e., e./f., in pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

- (2) The permittee shall record the following information for each month to determine compliance with the emission limitation specified in b)(1)b.:

- a. the name or identification of each coating and cleanup material employed;
- b. the VOC content of each coating and cleanup material as employed, in pounds per gallon;
- c. the amount of each coating and cleanup material employed, in gallons;
- d. the pounds VOC emitted from the use of each coating and cleanup material, calculated as b. x c. for each such material employed;
- e. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
- f. the total VOC emission rate, in pounds per month, calculated as the summation of d. for each material minus e.; and

- g. the VOC emissions over the most recent 12-month period, calculated by summing the tons VOC emitted over the most recent 12 months.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D) and PTI 02-16803]

- (3) Formulation data or USEPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a. each day during which the VOC emissions exceeded 20 pounds per hour, and the actual hourly VOC emissions for each such day; and
- b. each month during which the rolling, 12-month VOC emissions exceeded 10.0 tons, and the actual VOC emissions for each such rolling, 12-month period.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

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:

VOC emissions shall not exceed 20.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

- b. Emission Limitation:

VOC emissions shall not exceed 10.0 tons per rolling, 12-month period, including cleanup materials.



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Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

g) Miscellaneous Requirements

(1) None.



**7. R042, P-46**

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

P-46 Paint Spray Booth

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 operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI 02-16803]	Volatile organic compound (VOC) emissions shall not exceed 20.0 pounds per hour.
b.	OAC rule 3745-31-05(D) [PTI 02-16803]	VOC emissions shall not exceed 4.0 tons per rolling, 12-month period, including cleanup materials. See c)(1).
c.	OAC rule 3745-17-11(C)	See B.8 through B.16.
d.	40 CFR Part 63, Subpart P  [In accordance with 40 CFR Part 63, Subpart P, this emissions unit is an existing coating operation at a surface coating of plastic parts and products operation and subject to the emissions limitations and work practice standards specified in this subpart.]	See B.2 through B.7.
e.	40 CFR Part 63, Subpart A (63.1 through 63.15)	Table 2 to Subpart P of 40 CFR Part 63 – Applicability of General Provisions to Subpart P shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) The maximum VOC usage shall not exceed 4.0 tons based upon a rolling, 12-month summation of the volatile organic material employed.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-16803]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each day to determine compliance with the emission limitations specified in b)(1)a.:

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the VOC content of each coating and cleanup material, in pounds per gallon;
- d. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
- e. the VOC emission rate for all coatings, in pounds per day, calculated as the summation of  $b. \times c.$  for each coating employed – d.;
- f. the total number of hours the emissions unit was in operation; and
- g. the average hourly VOC emission rate for all coatings, i.e.,  $e./f.$ , in pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

- (2) The permittee shall record the following information for each month to determine compliance with the emission limitation specified in b)(1)b.:

- a. the name or identification of each coating and cleanup material employed;
- b. the VOC content of each coating and cleanup material as employed, in pounds per gallon;
- c. the amount of each coating and cleanup material employed, in gallons;
- d. the pounds VOC emitted from the use of each coating and cleanup material, calculated as  $b. \times c.$  for each such material employed;
- e. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
- f. the total VOC emission rate, in pounds per month, calculated as the summation of d. for each material minus e.; and



- g. the VOC emissions over the most recent 12-month period, calculated by summing the tons VOC emitted over the most recent 12 months.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D) and PTI 02-16803]

- (3) Formulation data or USEPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a. each day during which the VOC emissions exceeded 20 pounds per hour, and the actual hourly VOC emissions for each such day; and
- b. each month during which the rolling, 12-month VOC emissions exceeded 4.0 tons, and the actual VOC emissions for each such rolling, 12-month period.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

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:

VOC emissions shall not exceed 20.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

- b. Emission Limitation:

VOC emissions shall not exceed 4.0 tons per rolling, 12-month period, including cleanup materials.



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Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

g) Miscellaneous Requirements

(1) None.



8. R043, P-47

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

P-47 Paint Spray Booth

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 operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI 02-16803]	Volatile organic compound (VOC) emissions shall not exceed 20.0 pounds per hour.
b.	OAC rule 3745-31-05(D) [PTI 02-16803]	VOC emissions shall not exceed 6.5 tons per rolling, 12-month period, including cleanup materials. See c)(1).
c.	OAC rule 3745-17-11(C)	See B.8 through B.16.
d.	40 CFR Part 63, Subpart PPPP  [In accordance with 40 CFR Part 63, Subpart PPPP, this emissions unit is an existing coating operation at a surface coating of plastic parts and products operation and subject to the emissions limitations and work practice standards specified in this subpart.]	See B.2 through B.7.
e.	40 CFR Part 63, Subpart A (63.1 through 63.15)	Table 2 to Subpart PPPP of 40 CFR Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) The maximum VOC usage shall not exceed 6.5 tons based upon a rolling, 12-month summation of the volatile organic material employed.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-16803]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each day to determine compliance with the emission limitations specified in b)(1)a.:

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the VOC content of each coating and cleanup material, in pounds per gallon;
- d. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
- e. the VOC emission rate for all coatings, in pounds per day, calculated as the summation of b. x c. for each coating employed – d.;
- f. the total number of hours the emissions unit was in operation; and
- g. the average hourly VOC emission rate for all coatings, i.e., e./f., in pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

- (2) The permittee shall record the following information for each month to determine compliance with the emission limitation specified in b)(1)b.:

- a. the name or identification of each coating and cleanup material employed;
- b. the VOC content of each coating and cleanup material as employed, in pounds per gallon;
- c. the amount of each coating and cleanup material employed, in gallons;
- d. the pounds VOC emitted from the use of each coating and cleanup material, calculated as b. x c. for each such material employed;
- e. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
- f. the total VOC emission rate, in pounds per month, calculated as the summation of d. for each material minus e.; and

- g. the VOC emissions over the most recent 12-month period, calculated by summing the tons VOC emitted over the most recent 12 months.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D) and PTI 02-16803]

- (3) Formulation data or USEPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a. each day during which the VOC emissions exceeded 20 pounds per hour, and the actual hourly VOC emissions for each such day; and
- b. each month during which the rolling, 12-month VOC emissions exceeded 6.5 tons, and the actual VOC emissions for each such rolling, 12-month period.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

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:

VOC emissions shall not exceed 20.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

- b. Emission Limitation:

VOC emissions shall not exceed 6.5 tons per rolling, 12-month period, including cleanup materials.



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Ventra Salem, LLC  
**Permit Number:** P0118850  
**Facility ID:** 0215090195

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Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

g) Miscellaneous Requirements

(1) None.



**9. R044, P-25**

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

P-25 Paint Spray Booth

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 operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI 02-16861]	Volatile organic compound (VOC) emissions shall not exceed 20.0 pounds per hour.
b.	OAC rule 3745-31-05(D) [PTI 02-16861]	VOC emissions shall not exceed 8.25 tons per rolling, 12-month period, including cleanup materials. See c)(1).
c.	OAC rule 3745-17-11(C)	See B.8 through B.16.
d.	40 CFR Part 63, Subpart PPPP  [In accordance with 40 CFR Part 63, Subpart PPPP, this emissions unit is an existing coating operation at a surface coating of plastic parts and products operation and subject to the emissions limitations and work practice standards specified in this subpart.]	See B.2 through B.7.
e.	40 CFR Part 63, Subpart A (63.1 through 63.15)	Table 2 to Subpart PPPP of 40 CFR Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) The maximum VOC usage shall not exceed 8.25 tons based upon a rolling, 12-month summation of the volatile organic material employed.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-16861]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each day to determine compliance with the emission limitations specified in b)(1)a.:

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the VOC content of each coating and cleanup material, in pounds per gallon;
- d. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
- e. the VOC emission rate for all coatings, in pounds per day, calculated as the summation of b. x c. for each coating employed – d.;
- f. the total number of hours the emissions unit was in operation; and
- g. the average hourly VOC emission rate for all coatings, i.e., e./f., in pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16861]

- (2) The permittee shall record the following information for each month to determine compliance with the emission limitation specified in b)(1)b.:

- a. the name or identification of each coating and cleanup material employed;
- b. the VOC content of each coating and cleanup material as employed, in pounds per gallon;
- c. the amount of each coating and cleanup material employed, in gallons;
- d. the pounds VOC emitted from the use of each coating and cleanup material, calculated as b x c for each such material employed;
- e. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
- f. the total VOC emission rate, in pounds per month, calculated as the summation of d. for each material minus e.; and



- g. the VOC emissions over the most recent 12-month period, calculated by summing the tons VOC emitted over the most recent 12 months.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D) and PTI 02-16803]

- (3) Formulation data or USEPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16861]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a. each day during which the VOC emissions exceeded 20 pounds per hour, and the actual hourly VOC emissions for each such day; and
- b. each month during which the rolling, 12-month VOC emissions exceeded 8.25 tons, and the actual VOC emissions for each such rolling, 12-month period.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16861]

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:

VOC emissions shall not exceed 20.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16861]

- b. Emission Limitation:

VOC emissions shall not exceed 8.25 tons per rolling, 12-month period, including cleanup materials.



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Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16861]

g) Miscellaneous Requirements

(1) None.



**10. R045, P-48**

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

P-48 Paint Spray Booth

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 operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI 02-16861]	Volatile organic compound (VOC) emissions shall not exceed 20.0 pounds per hour.
b.	OAC rule 3745-31-05(D) [PTI 02-16861]	VOC emissions shall not exceed 12.18 tons per rolling, 12-month period, including cleanup materials. See c)(1).
c.	OAC rule 3745-17-11(C)	See B.8 through B.16.
d.	40 CFR Part 63, Subpart PPPP  [In accordance with 40 CFR Part 63, Subpart PPPP, this emissions unit is an existing coating operation at a surface coating of plastic parts and products operation and subject to the emissions limitations and work practice standards specified in this subpart.]	See B.2 through B.7.
e.	40 CFR Part 63, Subpart A (63.1 through 63.15)	Table 2 to Subpart PPPP of 40 CFR Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) The maximum VOC usage shall not exceed 12.18 tons based upon a rolling, 12-month summation of the volatile organic material employed.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-16861]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each day to determine compliance with the emission limitations specified in b)(1)a.:

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the VOC content of each coating and cleanup material, in pounds per gallon;
- d. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
- e. the VOC emission rate for all coatings, in pounds per day, calculated as the summation of b. x c. for each coating employed - d.;
- f. the total number of hours the emissions unit was in operation; and
- g. the average hourly VOC emission rate for all coatings, i.e., e./f., in pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16861]

- (2) The permittee shall record the following information for each month to determine compliance with the emission limitation specified in b)(1)b.:

- a. the name or identification of each coating and cleanup material employed;
- b. the VOC content of each coating and cleanup material as employed, in pounds per gallon;
- c. the amount of each coating and cleanup material employed, in gallons;
- d. the pounds VOC emitted from the use of each coating and cleanup material, calculated as b. x c. for each such material employed;
- e. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
- f. the total VOC emission rate, in pounds per month, calculated as the summation of d. for each material minus e.; and

- g. the VOC emissions over the most recent 12-month period, calculated by summing the tons VOC emitted over the most recent 12 months.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D) and PTI 02-16803]

- (3) Formulation data or USEPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16861]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a. each day during which the VOC emissions exceeded 20 pounds per hour, and the actual hourly VOC emissions for each such day; and
- b. each month during which the rolling, 12-month VOC emissions exceeded 12.18 tons, and the actual VOC emissions for each such rolling, 12-month period.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16861]

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:

VOC emissions shall not exceed 20.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16861]

- b. Emission Limitation:

VOC emissions shall not exceed 12.18 tons per rolling, 12-month period, including cleanup materials.



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Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16861]

g) Miscellaneous Requirements

(1) None.

**11. R046, P-65**

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

Coating line includes a parts washer and a drying oven along with 3 spray booths and a cure oven controlled by a regenerative thermal oxidizer.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 [PTI P0115331]	<p>Volatile organic compound (VOC) emissions from all coatings and cleanup materials employed shall not exceed 3.63 pounds per hour.</p> <p><b>Emissions from the combustion of natural gas in this emissions unit:</b></p> <p>VOC emissions shall not exceed 0.16 pound per hour and 0.69 ton per year.</p> <p>Particulate emissions with a diameter less than 10 microns (PM<sub>10</sub>) shall not exceed 0.11 pound per hour and 0.48 ton per year.</p> <p>Carbon monoxide (CO) emissions shall not exceed 1.20 pounds per hour and 5.26 tons per year.</p> <p>Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 1.43 pounds per hour and 6.26 tons per year.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.01 pound per hour and 0.04 ton per year.</p> <p>See b)(2)a, b)(2)c and b)(2)e.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(D) [PTI P0115331]	VOC emissions from all coating and cleanup operations shall not exceed 15.92 tons per rolling, 12-month period.  See b)(2)d and b)(2)e.
d.	OAC rule 3745-17-11(C)	See B.8 through B.16.
e.	40 CFR Part 63, Subpart PPPP  (In accordance with 40 CFR Part 63, Subpart PPPP, this emissions unit is an existing coating operation at a surface coating of plastic parts and products operation and subject to the emissions limitations and work practice standards specified in this subpart.)	See B.2 through B.7.
f.	40 CFR Part 63, Subpart A (63.1 through 63.15)	Table 2 to Subpart PPPP of 40 CFR Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC from the combustion of natural gas, PM<sub>10</sub>, CO, NO<sub>x</sub> and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential



to emit for VOC from the combustion of natural gas, PM<sub>10</sub>, CO, NO<sub>x</sub> and SO<sub>2</sub> is less than 10 tons per year.

- c. These emission limitations were established to reflect the potential to emit for this emissions unit while combusting natural gas. Therefore, it is not necessary to develop monitoring, record keeping, reporting and/or testing requirements to ensure compliance with these emission limitations.
- d. All of the VOC emissions from coating and cleanup operations shall be vented to a thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
- e. VOC emissions shall be vented to a thermal oxidizer which achieves an overall capture efficiency of 100 percent, by weight, and a control efficiency of 98 percent, by weight.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a daily basis for the coating and cleanup materials applied in this emissions unit:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content of each coating, as applied, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the uncontrolled VOC emissions from all coatings applied, i.e., the summation of the products of "b" x "c";
  - e. the overall fractional control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance;
  - f. the total controlled VOC emissions from all coatings applied, i.e., "d" x (1 - "e");
  - g. the name and identification of each cleanup material employed;
  - h. the VOC content of each cleanup material, in pounds per gallon;
  - i. the number of gallons of each cleanup material employed;
  - j. the total uncontrolled VOC emissions from all cleanup materials employed, i.e., the summation of the products of "h" x "i", in pounds;
  - k. the overall fractional control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance;

- l. the total controlled VOC emissions from all cleanup materials employed, i.e., the summation of the products of “j” x (1 - “k”), in pounds;
- m. the total VOC emissions from all coatings and cleanup materials employed during the day, i.e., “f” + “l”, in pounds;
- n. the number of hours of operation each day; and
- o. the pounds of VOC emissions per hour, i.e., the quotient of “m” divided by “o” in pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinners or hardeners added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115331]

- (2) The permittee shall record the following information for each month to determine compliance with the emission limitation specified in b)(1)c:
  - a. the name or identification of each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material as employed, in pounds per gallon;
  - c. the amount of each coating and cleanup material employed, in gallons;
  - d. the pounds VOC emitted from the use of each coating and cleanup material, calculated as b. x c. for each such material employed;
  - e. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
  - f. the overall fractional control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance;
  - g. the total controlled VOC emission rate, in pounds per month, calculated as the summation of d for each material minus e, times (1 - f); and
  - h. the controlled VOC emissions over the most recent 12-month period, calculated by summing the tons controlled VOC emitted over the most recent 12 months.

[Note: The coating information must be for the coatings as employed, including any thinners or hardeners added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115331]

- (3) Formulation data or USEPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115331]

- (4) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable combustion temperature within the thermal oxidizer, during any period of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115331]

- (5) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
  - b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

These records shall be maintained at the facility for a period of three years.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115331]

- (6) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
  - b. the magnitude of the deviation at that time;
  - c. the date the investigation was conducted;
  - d. the name(s) of the personnel who conducted the investigation; and

- e. the findings and recommendations.

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

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

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

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115331]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;
  - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;



- c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken;
- e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s);
- f. an identification for each day during which the VOC emission rate from the emissions unit exceeded 3.63 pounds per hour, and the average VOC emissions rate for each such day; and
- g. an identification for each month during which the rolling, 12-month VOC emissions exceeded 15.92 tons; and the actual VOC emissions for each such rolling, 12-month period.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115331]

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:

VOC emissions from all coatings and cleanup materials employed shall not exceed 3.63 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115331]

- b. Emission Limitation:

VOC emissions from all coating and cleanup operations shall not exceed 15.92 tons per rolling, 12-month period.



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Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115331]

c. Emission Limitation:

VOC emissions shall be vented to a thermal oxidizer which achieves an overall capture efficiency of 100 percent, by weight, and a control efficiency of 98 percent, by weight.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 51, Appendix M, Methods 204 through 204F for capture efficiency and the methods and procedures specified in OAC rule 3745-21-10 or an alternative test protocol approved by the Ohio EPA for control efficiency.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0115331]

g) Miscellaneous Requirements

- (1) None.



12. Emissions Unit Group - R001 - R004, R006, R014 - R016, and R019

EU ID	Operations, Property and/or Equipment Description
R001	P-1 Paint Spray Booth
R002	P-2 Paint Spray Booth
R003	P-4 Paint Spray Booth
R004	P-5 Paint Spray Booth
R006	P-B Paint Spray Booth
R014	P-10 Paint Spray Booth
R015	P-11 Paint Spray Booth
R016	P-12 Paint Spray Booth
R019	P-13 Paint Spray Booth

- 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 operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(C)	See B.8 through B.16.
b.	40 CFR Part 63, Subpart PPPP  [In accordance with 40 CFR Part 63, Subpart PPPP, this emissions unit is an existing coating operation at a surface coating of plastic parts and products operation and subject to the emissions limitations and work practice standards specified in this subpart.]	See B.2 through B.7.
c.	40 CFR Part 63, Subpart A (63.1 through 63.15)	Table 2 to Subpart PPPP of 40 CFR Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.



- (2) Additional Terms and Conditions
  - a. None.
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) None.
- e) Reporting Requirements
  - (1) None.
- f) Testing Requirements
  - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. None.
- g) Miscellaneous Requirements
  - (1) None.



13. Emissions Unit Group - R023 - R027, R035 and R037

EU ID	Operations, Property and/or Equipment Description
R023	P-20 Paint Spray Booth
R024	P-21 Paint Spray Booth
R025	P-22 Paint Spray Booth
R026	P-23 Paint Spray Booth
R027	P-24 Paint Spray Booth
R035	A-128 Adhesive Spray Booth
R037	V-10 Paint Spray Booth

- 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 operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI 17-039] [PTI 17-631] [PTI 17-761]	The Best Available Technology Determination was compliance with the applicable rules.
b.	OAC rule 3745-17-11(C)	See B.8 through B.16.
c.	40 CFR Part 63, Subpart PPPP  [In accordance with 40 CFR Part 63, Subpart PPPP, this emissions unit is an existing coating operation at a surface coating of plastic parts and products operation and subject to the emissions limitations and work practice standards specified in this subpart.]	See B.2 through B.7
d.	40 CFR Part 63, Subpart A (63.1 through 63.15)	Table 2 to Subpart PPPP of 40 CFR Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.



- (2) Additional Terms and Conditions
  - a. None.
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) None.
- e) Reporting Requirements
  - (1) None.
- f) Testing Requirements
  - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. None.
- g) Miscellaneous Requirements
  - (1) None.



14. Emissions Unit Group - R038 and R040

EU ID	Operations, Property and/or Equipment Description
R038	P-42 Paint Spray Booth
R040	P-44 Paint Spray Booth

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 operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) [PTI 02-16803]	Volatile organic compound (VOC) emissions shall not exceed 20.0 pounds per hour.
b.	OAC rule 3745-31-05(D) [PTI 02-16803]	VOC emissions shall not exceed 7.0 tons per rolling, 12-month period, including cleanup materials. See c)(1).
c.	OAC rule 3745-17-11(C)	See B.8 through B.16.
d.	40 CFR Part 63, Subpart P  [In accordance with 40 CFR Part 63, Subpart P, this emissions unit is an existing coating operation at a surface coating of plastic parts and products operation and subject to the emissions limitations and work practice standards specified in this subpart.]	See B.2 through B.7.
e.	40 CFR Part 63, Subpart A (63.1 through 63.15)	Table 2 to Subpart P of 40 CFR Part 63 – Applicability of General Provisions to Subpart P shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) The maximum VOC usage shall not exceed 7.0 tons based upon a rolling, 12-month summation of the volatile organic material employed.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-16803]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each day to determine compliance with the hourly emission limitation specified in b)(1)a.:

- a. the company identification for each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. the VOC content of each coating and cleanup material, in pounds per gallon;
- d. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
- e. the VOC emission rate for all coatings, in pounds per day, calculated as the summation of b. x c. for each coating employed – d.;
- f. the total number of hours the emissions unit was in operation; and
- g. the average hourly VOC emission rate for all coatings, i.e., e./f., in pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

- (2) The permittee shall record the following information for each month to determine compliance with the emission limitation specified in b)(1)b.:

- a. the name or identification of each coating and cleanup material employed;
- b. the VOC content of each coating and cleanup material as employed, in pounds per gallon;
- c. the amount of each coating and cleanup material employed, in gallons;
- d. the pounds VOC emitted from the use of each coating and cleanup material, calculated as b. x c. for each such material employed;
- e. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
- f. the total VOC emission rate, in pounds per month, calculated as the summation of d. for each material minus e.; and

- g. the VOC emissions over the most recent 12-month period, calculated by summing the tons VOC emitted over the most recent 12 months.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D) and PTI 02-16803]

- (3) Formulation data or USEPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a. each day during which the VOC emissions exceeded 20 pounds per hour, and the actual hourly VOC emissions for each such day; and
- b. each month during which the rolling, 12-month VOC emissions exceeded 7.0 tons, and the actual VOC emissions for each such rolling, 12-month period.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

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:

VOC emissions shall not exceed 20.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

- b. Emission Limitation:

VOC emissions shall not exceed 7.0 tons per rolling, 12-month period, including cleanup materials.



**Proposed Title V Permit**  
Ventra Salem, LLC  
**Permit Number:** P0118850  
**Facility ID:** 0215090195

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

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-16803]

g) Miscellaneous Requirements

(1) None.