



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

10/29/2015

Justin Apgar  
 Superior Marine Ways Inc - Proctorville  
 P.O. Box 519  
 South Point, OH 45680

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

Facility ID: 0744000186  
 Permit Number: P0119494  
 Permit Type: Administrative Modification  
 County: Lawrence

Certified Mail

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

Dear Permit Holder:

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

Andrew Hall and Portsmouth City Health Dept., Air Pollution Unit  
 Permit Review/Development Section 605 Washington Street  
 Ohio EPA, DAPC 3rd Floor  
 50 West Town Street Suite 700 Portsmouth, OH 45662  
 PO Box 1049  
 Columbus, Ohio 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Portsmouth City Health Dept., Air Pollution Unit at (740)353-5156.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
 Portsmouth; Kentucky; West Virginia



## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Superior Marine Ways Inc – Proctorville has two emission units that coats marine vessels (K001) and miscellaneous marine parts (K002). As required as part of a recent USEPA Administrative Consent Order issued to this facility, this permit is being modified to add the applicability of 40 CFR Part 63, Subpart II (Shipbuilding and Repair MACT).

3. Facility Emissions and Attainment Status:

Superior Marine Ways Inc – Proctorville is located in Lawrence County. Lawrence County is currently designated as attainment area for all criteria pollutants. The facility currently has a PTE of less than 100 TPY for all criteria pollutants and less than 10 TPY for a single HAP and 25 TPY for combined HAPs.

4. Source Emissions:

This is an administrative permit modification to add 40 CFR Part 63, Subpart II as an applicable requirement. There is no change in emissions with the issuance of this permit modification.

5. Conclusion:

There is no change in emissions due to this permit modification. Only the applicability of 40 CFR Part 63, Subpart II and terms associated with that rule were added in this permit.

6. Please provide additional notes or comments as necessary:

None

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

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| VOC              | 23.67                |



## PUBLIC NOTICE

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

Draft Air Pollution Permit-to-Install and Operate Administrative Modification

Superior Marine Ways Inc - Proctorville

St Rte 7,,Proctorville, OH 45669

ID#:P0119494

Date of Action: 10/29/2015

Permit Desc:Administrative Permit Modification to add applicability of 40 CFR Part 63 Subpart II (Shipbuilding and Ship Repair (Surface Coating)).

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Anne Chamberlin, Portsmouth City Health Dept., Air Pollution Unit, 605 Washington Street 3rd Floor, Portsmouth, OH 45662. Ph: (740)353-5156





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Superior Marine Ways Inc - Proctorville**

|                |                                   |
|----------------|-----------------------------------|
| Facility ID:   | 0744000186                        |
| Permit Number: | P0119494                          |
| Permit Type:   | Administrative Modification       |
| Issued:        | 10/29/2015                        |
| Effective:     | To be entered upon final issuance |
| Expiration:    | To be entered upon final issuance |





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Superior Marine Ways Inc - Proctorville

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**Draft Permit-to-Install and Operate**  
Superior Marine Ways Inc - Proctorville  
**Permit Number:** P0119494  
**Facility ID:** 0744000186

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

## Authorization

Facility ID: 0744000186  
Application Number(s): M0003579  
Permit Number: P0119494  
Permit Description: Administrative Permit Modification to add applicability of 40 CFR Part 63 Subpart II (Shipbuilding and Ship Repair (Surface Coating))  
Permit Type: Administrative Modification  
Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 10/29/2015  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Superior Marine Ways Inc - Proctorville  
St Rte 7  
Proctorville, OH 45669

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

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

Portsmouth City Health Dept., Air Pollution Unit  
605 Washington Street  
3rd Floor  
Portsmouth, OH 45662  
(740)353-5156

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



**Draft Permit-to-Install and Operate**  
Superior Marine Ways Inc - Proctorville  
**Permit Number:** P0119494  
**Facility ID:** 0744000186

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

## Authorization (continued)

Permit Number: P0119494

Permit Description: Administrative Permit Modification to add applicability of 40 CFR Part 63 Subpart II (Shipbuilding and Ship Repair (Surface Coating))

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

**Emissions Unit ID:**

Company Equipment ID:  
Superseded Permit Number:  
General Permit Category and Type:

**K001**

Outdoor Marine Vessel Coating  
P0117517  
Not Applicable

**Emissions Unit ID:**

Company Equipment ID:  
Superseded Permit Number:  
General Permit Category and Type:

**K002**

Miscellaneous Marine Parts Coating  
P0117517  
Not Applicable



**Draft Permit-to-Install and Operate**  
Superior Marine Ways Inc - Proctorville  
**Permit Number:** P0119494  
**Facility ID:** 0744000186  
**Effective Date:** To be entered upon final issuance

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



**Draft Permit-to-Install and Operate**  
Superior Marine Ways Inc - Proctorville

**Permit Number:** P0119494

**Facility ID:** 0744000186

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

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



**Draft Permit-to-Install and Operate**  
Superior Marine Ways Inc - Proctorville  
**Permit Number:** P0119494  
**Facility ID:** 0744000186

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

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.
2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart II, National Emissions Standards for Hazardous Air Pollutant Emissions from Shipbuilding and Ship Repair (Surface Coating): K001 and K002.

The complete MACT requirements including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.



**Draft Permit-to-Install and Operate**  
Superior Marine Ways Inc - Proctorville

**Permit Number:** P0119494

**Facility ID:** 0744000186

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

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

**1. K001, Outdoor Marine Vessel Coating**

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

Outdoor Marine Vessel Coating of barge decks, barge hulls and barge interiors.

Administrative modification to add applicability of the 40 CFR Part 63, Subpart II (Shipbuilding and Repair) MACT due to USEPA Administrative Consent Order.

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

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

a. None.

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

a. 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)     | <p>Volatile organic compound (VOC) emissions from all coating and cleanup materials employed shall not exceed 141.99 pounds per day and 23.66 tons per year.</p> <p>The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d).</p> <p>See b)(2)a.</p> |
| b. | OAC rule 3745-21-09(U)(1)(d)  | The VOC content of the coating employed on the barge interiors shall not exceed 3.5 pounds of VOC per gallon of  |



|    | Applicable Rules/Requirements                       | Applicable Emissions Limitations/Control Measures  |
|----|---|--|
|    |   | coating, excluding water and exempt solvents.  |
| c. | OAC rule 3745-21-09(U)                              | The barge deck, barge hulls and barge repair are exempt from this rule based on OAC rule 3734-21-09(U)(2)(a) since these are exterior marine vessels.          |
| d. | 40 CFR Part 63, Subpart II (40 CFR 63.780 – 63.789) | See b)(2)b and b)(2)c.   |
| e. | 40 CFR Part 63.1 – 63.15                            | Table 1 to Subpart II of Part 63 – General Provisions of Applicability to Subpart II lists which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply. |

(2) Additional Terms and Conditions

- a. The daily VOC emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- b. No owner or operator shall cause or allow the application of any coating to a ship with an as-applied VOHAP content exceeding the applicable limit given in Table 2 of 40 CFR Part 63, Subpart II, as determined by the procedures described in 40 CFR 63.785(c)(1) through (c)(3).
- c. Each owner or operator shall ensure that:
  - i. all handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills; and
  - ii. all containers, tanks, vats, drums, and piping systems are free of cracks, holes and other defects and remain closed unless materials are being added to or removed from them.

c) Operational Restrictions

- (1) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for this emissions unit:

- a. the company identification of each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup materials employed;
- c. the VOC content of each coating and cleanup material employed, in pounds per gallon; and
- d. the total VOC emissions from all the coating and cleanup materials employed, in pounds [i.e., the sum of d)(1)b times d)(1)c for each coating and cleanup material employed].

(2) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).

e) Reporting Requirements

(1) The permittee shall notify the Director (Portsmouth Local Air Agency) in writing of each record showing a coating, used for barge interiors, greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (Portsmouth Local Air Agency) within 30 days after the exceedance occurs.

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

(3) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).

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 coating and cleanup materials employed shall not exceed 141.99 pounds per day.

Applicable Compliance Method:

The daily VOC emission limitation was determined based on the sum of the following:

Determine the daily emissions from the barge decks, barge hulls, barge interiors and barge repair parts by multiplying the maximum amount of coating and cleanup material used (gal/day) for each by the maximum VOC content of the coating and cleanup material (lbs/gal) for each.



b. Emission Limitation:

VOC emissions from all coating and cleanup materials employed shall not exceed 23.66 tons per year.

Applicable Compliance Method:

The annual VOC emission limitation was determined based on the sum of the following:

Determine the annual emissions from the barge decks, barge interiors and barge repair parts by multiplying the maximum amount of coating and cleanup material used (gal/year) for each by the maximum VOC content of the coating and cleanup material (lbs/gal) for each, and then dividing by 2000 lbs/ton.

Compliance with this emission limitation shall be based on the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.



**2. K002, Miscellaneous Marine Parts Coating**

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

Outdoor miscellaneous marine parts coating.

Administrative modification to add applicability of the 40 CFR Part 63, Subpart II (Shipbuilding and Repair) MACT due to USEPA Administrative Consent Order.

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

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

a. None.

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

a. 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)                           | Volatile organic compound (VOC) emissions from all coating and cleanup materials employed shall not exceed 21.17 pounds per day and 0.01 ton per year.<br><br>See b)(2)a. |
| b. | OAC rule 3745-21-09(U)                              | This emissions unit is exempt from this rule based on OAC rule 3734-21-09(U)(2)(e)(iii) since they do not use more than 10 gallons per day.                               |
| c. | 40 CFR Part 63, Subpart II (40 CFR 63.780 – 63.789) | See b)(2)b and b)(2)c.  |



|    | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures  |
|----|-------------------------------|--|
| d. | 40 CFR Part 63.1 – 63.15      | Table 1 to Subpart II of Part 63 – General Provisions of Applicability to Subpart II lists which parts of the General Provisions in 40 CFR 63.1 – 63.15 apply. |

(2) Additional Terms and Conditions

- a. The daily VOC emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this emission limitation.
- b. No owner or operator shall cause or allow the application of any coating to a ship with an as-applied VOHAP content exceeding the applicable limit given in Table 2 of 40 CFR Part 63, Subpart II, as determined by the procedures described in 40 CFR 63.785(c)(1) through (c)(3).
- c. Each owner or operator shall ensure that:
  - i. all handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills; and
  - ii. all containers, tanks, vats, drums, and piping systems are free of cracks, holes and other defects and remain closed unless materials are being added to or removed from them.

c) Operational Restrictions

- (1) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for this emissions unit:
  - a. the company identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup materials employed;
  - c. the VOC content of each coating and cleanup material employed, in pounds per gallon; and
  - d. the total VOC emissions from all the coating and cleanup materials employed, in pounds [i.e., the sum of d)(1)b times d)(1)c for each coating and cleanup material employed].

- (2) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (2) See 40 CFR Part 63, Subpart II (40 CFR Part 63.780 - 63.789).

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 coating and cleanup materials employed shall not exceed 21.17 pounds per day.

Applicable Emission Limitation:

The daily VOC emission limitation was determined based on the sum of the following:

Determine the daily emissions for the miscellaneous metal parts by multiplying the maximum amount of coating and cleanup material used (gal/day) for each by the maximum VOC content of the coating and cleanup material (lbs/gal) for each.

b. Emission Limitation:

VOC emissions from all coating and cleanup materials employed shall not exceed 0.01 ton per year.

Applicable Emission Limitation:

The annual VOC emission limitation was determined based on the sum of the following:

Determine the annual emissions for the miscellaneous metal parts by multiplying the maximum amount of coating and cleanup material used (gal/year) for each by the maximum VOC content of the coating and cleanup material (lbs/gal) for each, and then dividing by 2000 lbs/ton.

Compliance with this emission limitation shall be based on the record keeping requirements specified in d)(1).



**Draft Permit-to-Install and Operate**  
Superior Marine Ways Inc - Proctorville

**Permit Number:** P0119494

**Facility ID:** 0744000186

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

g) Miscellaneous Requirements

(1) None.