Ohio Environmental Protection Agency

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

Certified Mail

11/19/2015

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

Mr. Jack Prause
LEATHER RESOURCE OF AMERICA, INC.
494 East Main Road
Conneaut, OH 44030

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0204020430
Permit Number: P0117480
Permit Type: Renewal
County: Ashtabula

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: Ohio EPA-NEDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
LEATHER RESOURCE OF AMERICA, INC.

Facility ID:	0204020430
Permit Number:	P0117480
Permit Type:	Renewal
Issued:	11/19/2015
Effective:	11/19/2015
Expiration:	11/19/2020

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
LEATHER RESOURCE OF AMERICA, INC.

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Authorization

Facility ID:	0204020430
Application Number(s):	A0050815
Permit Number:	P0117480
Permit Description:	Renewal FEPTIO for 3 Binks 12-gun spray/coating booths with IR drying ovens (R001, R002 and R003) and two (2) roll coaters (R005 and R008).
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	11/19/2015
Effective Date:	11/19/2015
Expiration Date:	11/19/2020

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

LEATHER RESOURCE OF AMERICA, INC.
494 EAST MAIN RD
Conneaut, OH 44030

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

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

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

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

Authorization (continued)

Permit Number: P0117480
Permit Description: Renewal FEPTIO for 3 Binks 12-gun spray/coating booths with IR drying ovens (R001, R002 and R003) and two (2) roll coaters (R005 and R008).

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

Emissions Unit ID:	**R005**
Company Equipment ID:	Roll Coater no. 2
Superseded Permit Number:	P0112984
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R008**
Company Equipment ID:	Roll Coater no. 3
Superseded Permit Number:	P0112641
General Permit Category and Type:	Not Applicable

Group Name: Binks 12-gun spray/coating booth

Emissions Unit ID:	**R001**
Company Equipment ID:	Binks 12 gun spray/coating booth with IR drying oven
Superseded Permit Number:	P0112984
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R002**
Company Equipment ID:	Binks 12 gun spray booth/coating booth with IR drying oven
Superseded Permit Number:	P0112984
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R003**
Company Equipment ID:	Binks 12 gun spray/coating booth with IR drying oven
Superseded Permit Number:	P0112984
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto 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.

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) B.2.a) through B.2.c).

2. Federally Enforceable Permit to Install and Operate P0117480 for this air contaminant source takes into account the following restrictions, regarding the emissions units specified in B.3, as proposed by the permittee for the purpose of avoiding New Emission Standards for Hazardous Air Pollutants for Leather Finishing Operations requirements under 40 CFR Part 63, Subpart TTTT and Title V requirements under OAC rules 3745-77-02 through 3745-77-10:

   a) The total facility-wide volatile organic compounds (VOCs) emissions from emissions units R001, R002, R003, R005 and R008, combined, shall not exceed 45.0 tons/year, based on a rolling 12-month summation, and shall be achieved by employing the operational restrictions identified below (B.3.).

   b) The total individual hazardous air pollutant (HAP) emissions from emissions units R001, R002 and R003, combined, shall not exceed 6.0 tons/year, 1.0 ton per year from emissions unit R005 and 1.0 ton per year from emissions unit R008. The facility-wide individual HAP emissions shall not exceed 8.0 tons per year, based on a rolling, 12-month summation, and shall be achieved by employing the operational restrictions identified below (B.3).

   c) The total combined HAPs from emissions units R001, R002 and R003, combined, shall not exceed 9.9 tons per year, 1.0 ton per year from emissions unit R005 and 1.0 ton per year from emissions unit R008. The facility-wide total combined HAP emissions shall not exceed 11.9 tons per year, based on a rolling, 12-month summation, and shall be achieved by employing the operational restrictions identified below (B.3).

3. Operational Restrictions

   a) The maximum annual facility-wide coatings and cleanup material(s) usage for emissions units R001, R002, R003, R005 and R008, combined, shall not exceed 145,161 gallons based upon a rolling, 12-month summation of the materials usage rates.

4. Monitoring and/or Record Keeping Requirements

   a) The permittee shall maintain monthly records of the following information for the emissions units identified in B.2.a) through B.2.c):

      (1) the rolling, 12-month VOC emissions, in tons;

(2) the rolling, 12-month individual HAP emissions for each HAP, in tons; and

(3) the rolling, 12-month total combined HAP emissions, in tons.

5. Reporting Requirements

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

(1) each month during which exceedances of the rolling, 12-month emissions limitation(s) for VOCs, individual HAP and total combined HAPs from the emissions units specified in B.2.a) through B.2.c) exceeded 45.0 tons of VOCs, 8.0 tons of each individual HAP and 11.9 tons total combined HAPs;

(2) for each deviation of the VOCs, individual HAP or the total combined HAPs emission limit(s), the actual rolling, 12-month emissions of VOCs, individual HAP and total combined HAPs, in tons; and

(3) all exceedances of the rolling, 12-month limitation on material(s) usage.

These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit. If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

6. Testing Requirements

a) <u>Emission Limitations</u>:

45.0 tons/year of VOCs, based on a rolling, 12-month summation of the emissions from the emissions units specified in B.2.a).;

8.0 tons/year of each individual HAP, based on a rolling, 12-month summation of the emissions from the emissions units specified in B.2.b); and

11.9 tons/year of total combined HAPs, based on a rolling, 12-month summation of the emissions from the emissions units specified in B.2.c).

<u>Applicable Compliance Method</u>:

Compliance shall be demonstrated based upon the record keeping requirements specified in B.4.

7. Miscellaneous Requirements

a) The facility-wide allowable associated with EUs R001, R002 and R003 is 45 TPY of VOC combined. While R005 and R008 have allowable emissions of 9.9 TPY VOC and 16.8 TPY (respectively), the facility is ultimately subject to a 45 TPY VOC limit, by limiting facility-wide coatings and cleanup material usage to 145,161 gallons per rolling 12-month period (see table submitted by the facility below).

Federally Enforceable Emission Limits						
	R001	**R002**	**R003**	**R005**	**R008**	**Facility-Wide**
VOC (lbs/day)	650.4	650.4	650.4	131	N/A	N/A
VOC (tons/yr)	45	45	45	9.9	16.8	45
Individual HAP (tons/yr)	6.0			1.0	1.0	8.0
Total Combined HAPs (tons/yr)	9.9			1.0	1.0	11.9

C. Emissions Unit Terms and Conditions

1. R005, Roll Coater no. 2

Operations, Property and/or Equipment Description:

Manual roll coating operation no. 2 of leather, where coating exhausts are vented to SM #3 booth egress, and where air drying exhausts are vented to SM #3 dryer egress.

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. d)(3).

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	The volatile organic compound (VOC) emissions from coatings and cleanup materials usage shall not exceed 131 pounds per day. Compliance with this rule also includes compliance with the emissions limitation provided by OAC rule 3745-31-05(E). See b)(2)a.
b.	OAC rule 3745-31-05(E)	The volatile organic compound (VOC) emissions from coatings and cleanup materials usage shall not exceed 9.9 tons per year.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
d.	OAC rule 3745-31-05(D)(1)(b) – restriction to avoid Title V and MACT rule requirements	See B.2 through B.7.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions 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 revision 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 limits/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.

PTIO P0117480 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements for under OAC rule 3745-31-05(A)(3):

VOC emissions from coatings and cleanup materials usage shall not exceed 131 pounds per day and 9.9 tons per year.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

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 individual hazardous air pollutant (HAP) content of each coating and cleanup material, in pounds per gallon; and

e. the total VOC emissions rate for all coatings and all cleanup materials, in pounds per day.

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

a. the total volume of all coatings and all cleanup materials employed, in gallons per month.

b. the total emissions for all coatings and all cleanup materials of all VOCs, in tons per month;

c. the total emissions for all coatings and all cleanup materials of each individual HAP, in tons per month; and,

d. the total emissions for all coatings and all cleanup materials of all HAPs combined, in tons per month.

[Note: A HAP is any air pollutant listed in or pursuant to section 112(b) of the Clean Air Act (42 U.S.C. 7401 et. Seq. and amendments).]

(3) Modeling to demonstrate compliance with, the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified federally enforceable permit-to-install and operate (FEPTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. no more than 131 pounds of VOC per day;

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

(2) The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Ohio EPA Northeast District Office).

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

a. a statement as to whether the coating operation was in compliance with each of the listed applicable rules and requirements, including whether the records of the coating and cleanup material usage demonstrated that annual emissions, as calculated in d)(1), did not exceed the ton per year VOC limit.

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:

The VOC emissions shall not exceed 131 pounds per day from coatings and cleanup materials usage.

Applicable Compliance Method:

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

b. Emission Limitation:

The VOC emissions from coatings and cleanup materials usage shall not exceed 9.9 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by the summation of the daily VOC emissions for the calendar year, based upon the record keeping requirements specified in d)(1)e, divided by 2000 pounds per ton.

g) Miscellaneous Requirements

(1) None.

2. R008, Roll Coater no. 3

Operations, Property and/or Equipment Description:

Roll Coater #3

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. d)(2).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	The volatile organic compound (VOC) emissions from coatings and cleanup materials usage shall not exceed 16.8 tons per rolling, 12-month period.
b.	OAC rule 3745-31-05(D)(1)(b) – restriction to avoid Title V and MACT rule requirements	See B.2 through B.7.

(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 for this emissions unit:

a. the total volume of all coatings and all cleanup materials employed, in gallons per month.

b. the total emissions for all coatings and all cleanup materials of all VOCs, in tons per month;

c. the total emissions for all coatings and all cleanup materials of each individual HAP, in tons per month; and,

d. the total emissions for all coatings and all cleanup materials of all HAPs combined, in tons per month.

[Note: A HAP is any air pollutant listed in or pursuant to section 112(b) of the Clean Air Act (42 U.S.C. 7401 et. Seq. and amendments).]

(2) Modeling to demonstrate compliance with, the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified federally enforceable permit-to-install and operate (FEPTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 16.8 tons of VOC per rolling, 12-month period;

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Ohio EPA Northeast District Office).

(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. The annual compliance reports shall include:

a. a statement as to whether the coating operation was in compliance with each of the listed applicable rules and requirements, including whether the records of the coating and cleanup material usage demonstrated that annual emissions, as calculated in d)(1), did not exceed the ton per month VOC limit.

f) Testing Requirements

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

a. <u>Emission Limitation</u>:

The VOC emissions from coatings and cleanup materials usage shall not exceed 16.8 tons per rolling, 12-month period.

<u>Applicable Compliance Method</u>:

Compliance shall be demonstrated by the summation of the monthly VOC emissions for the calendar year, based upon the record keeping requirements specified in d)(1)d.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group - Binks 12-gun spray/coating booths with IR drying ovens: R001,R002,R003

EU ID	Operations, Property and/or Equipment Description
R001	Spray coating machine no. 1 to coat leather with a paint filter to control particulate emissions and with an infra-red drying oven fired by twelve 0.1 mmBtu/hr natural gas burners
R002	Spray coating machine no. 2 to coat leather with a paint filter to control particulate emissions and with an infra-red drying oven fired by twelve 0.1 mmBtu/hr natural gas burners
R003	Spray coating machine no. 3 to coat leather with a paint filter to control particulate emissions and with an infra-red drying oven fired by twelve 0.1 mmBtu/hr natural gas burners

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. d)(8) through d)(11) and e)(2).

(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)	The volatile organic compound (VOC) emissions from coatings and cleanup materials usage shall not exceed 650.4 lbs/day and 45.0 tons/year from each emissions unit.
b.	OAC rule 3745-17-11(C)	See b)(2)a, c)(1) and c)(2).
c.	OAC rule 3745-31-05(D)(1)(b) – restriction to avoid Title V and MACT rule requirements	See B.2 through B.7.

(2) Additional Terms and Conditions

a. The permittee shall operate the dry particulate filter system, associated with an emissions unit, whenever the emissions unit is in operation.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever these 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.

(2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

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

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 individual hazardous air pollutant (HAP) content of each coating and cleanup material, in pounds per gallon; and

e. the total VOC emissions rate for all coatings and all cleanup materials, in pounds per day.

(2) The permittee shall collect and record the following information monthly for each emissions unit:

a. the total volume of all coatings and all cleanup materials employed, in gallons per month;

b. the total emissions for all coatings and all cleanup materials of all VOCs, in tons per month;

c. the total emissions for all coatings and all cleanup materials of each individual HAP, in tons per month; and

d. the total emissions for all coatings and all cleanup materials of all HAPs combined, in tons per month.

[Note: A HAP is any air pollutant listed in or pursuant to section 112(b) of the Clean Air Act (42 U.S.C. 7401 et. Seq. and amendments).]

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

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

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

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

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

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

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

(8) The federally enforceable permit to install and operate (FEPTIO) application for P0112984 for these emissions unit(s), R001, R002 and R003, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA

approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., **X** hours per day and **Y** days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

   TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

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

   Toxic Contaminant: propylene glycol methyl ether

   Maximum Hourly Emission Rate (lb/hr): 24.2 from R001-R003 combined

   Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$): 1,504.23 from R001-R003 combined

   MAGLC ($\mu g/m^3$): 14,430

   TLV (mg/m^3): 606,000

The permittee, has demonstrated that emissions of propylene glycol methyl ether, from emissions unit(s) R001 through R003, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

(9) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

(10) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(11) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. the dry particulate filter shall be employed during all periods of coating application to control particulate emissions; and

ii. no more than 650.4 lbs VOC per day;

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Ohio EPA Northeast District Office).

(2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the

emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

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

a. a statement as to whether the coating operation was in compliance with each of the listed applicable rules and requirements, including whether the records of the coating and cleanup material usage demonstrated that annual emissions, as calculated in d)(2), did not exceed the ton per year VOC limit; and

b. identification of any period of time (date and number of hours) when the dry filtration system was not in service or was not operating in accordance with the manufacturer's or permittee's documented instructions during coating operations.

f) Testing Requirements

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

a. <u>Emission Limitation</u>:

The VOC emissions from coatings and cleanup materials usage shall not exceed 650.4 lbs/day from each emissions unit.

<u>Applicable Compliance Method</u>:

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

b. <u>Emission Limitation</u>:

The VOC emissions from coatings and cleanup materials usage shall not exceed 45.0 tons/year from each emissions unit.

<u>Applicable Compliance Method</u>:

Compliance shall be demonstrated by the summation of the daily VOC emissions for the calendar year, based upon the record keeping requirements specified in d)(1)e, divided by 2000 pounds/ton.

g) Miscellaneous Requirements

(1) None.