



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

1/12/2016

Certified Mail

Clifford Mentrup  
Senco Products Inc.  
4270 Ivy Pointe Boulevard  
CINCINNATI, OH 45208

Facility ID: 1431340977  
Permit Number: P0117584  
County: Hamilton

RE: DRAFT AIR POLLUTION TITLE V PERMIT  
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Cincinnati Enquirer. A copy of the public notice, the Statement of Basis, 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  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219

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 processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

A handwritten signature in cursive script that reads "Michael E. Hopkins".

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*  
SWOAQA; Indiana; Kentucky



## 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 Title V Permit Renewal

Senco Products Inc.

8450 BROADWELL RD., , Cincinnati, OH 45244-1611

ID#: P0117584

Date of Action: 1/12/2016

PermitDesc: Renewal of Title V Operating Permit for a nail and staple manufacturing facility, includes wire drawing, band lines, collating, and staple machines..

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: Bonnie Pray, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777





**Statement of Basis**  
 Senco Products Inc.  
**Permit Number:** P0117584  
**Facility ID:** 1431340977

## Statement of Basis For Air Pollution Title V Permit

Facility ID:	1431340977
Facility Name:	Senco Products Inc.
Facility Description:	Nail and staple manufacturing
Facility Address:	8450 Broadwell Rd., Cincinnati, OH 45244-1611
Permit #:	P0117584, Renewal
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input type="checkbox"/> Carbon Monoxide <input checked="" type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter 10 microns <input type="checkbox"/> Single Hazardous Air Pollutant <input type="checkbox"/> Combined Hazardous Air Pollutants <input type="checkbox"/> Maximum Available Control Technology Standard(s) <input type="checkbox"/> GHG <input type="checkbox"/> Title IV	

### A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes. The insignificant emissions units (IEUs) that have applicable state and/or federally-enforceable requirements are included in the terms and conditions in Section B. All other IEUs at this facility are excluded from the requirements to obtain installation or operating permits pursuant to OAC rules 3745-15-05 and 3745-31-03 and have no applicable federally enforceable requirements; therefore, these IEUs are not included in the terms and conditions of this permit pursuant to OAC rule 3745-77-07(A)(13).
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit	N/A



**Statement of Basis**  
 Senco Products Inc.  
 Permit Number: P0117584  
 Facility ID: 1431340977

document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	A large number of emissions units have been shut down at this facility since the prior Title V and these changes are reflected in this renewal. In addition, a number of emissions units with underlying PTIs have been moved from the list of IEUs in Section B of the prior Title V and are now listed in Section C with applicable requirements and terms and conditions. Since the prior Title V, a PTI modification #P0116099 was issued for emissions unit K372 (formerly R001) and the terms and conditions of modification have been incorporated into this renewal.
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	A CAM Plan is required for emissions units K001 and K005 based on potential pre-control device emissions of VOC. CAM Plan requirements, including the indicators monitored by the permittee, are outlined in the terms and conditions of K001 and K005 in Section C of this Title V renewal.

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

Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
B.2.	77-07(A)(13)	N	Listing of insignificant emissions units that are subject to SIP-approved and/or federal regulations.
B.3.	N	40 CFR Part 63	Clarifying and reference term for rule applicability determination regarding emissions units contained in the permit subject to National Emission Standards for Hazardous Air Pollutants (NESHAP).
B.4.	N	40 CFR Part 60	Clarifying and reference term for rule applicability determination regarding emissions units contained in the permit subject to New Source Performance Standards (NSPS).
B.5	N	40 CFR Part 64	Clarifying and reference term for rule applicability determination regarding emissions units contained in the permit subject to Compliance Assurance Monitoring (CAM).

**C. Emissions Unit Terms and Conditions**

Key:													
EU = emissions unit ID							R = record keeping requirements						
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)							Rp = reporting requirements						
OR = operational restriction							ET = emission testing requirements (not including compliance method terms)						
M = monitoring requirements							St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement						
ENF = did noncompliance issues drive the monitoring requirements?							Misc = miscellaneous requirements						
EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745- )	Other										
F001	Exempt	17-07(B)	N	Y	N	N	N	N	N	N	N	N	ND - EUs are exempt from the visible emission limitations for fugitive dust in OAC rule 3745-17-07(B) because they are not located within areas identified in Appendix A of OAC rule 3745-17-08.
F001	Exempt	17-08(B)	N	Y	N	N	N	N	N	N	N	N	ND - EUs are exempt from the fugitive dust control measures in OAC rule 3745-17-08(B) because they are not located within areas identified in Appendix A of OAC rule 3745-17-08.
K001	VOC emissions shall not exceed 5.70 lbs/hr	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	Y	N	N	OR: EU subject to coating VOC content restrictions and 81% overall capture and control efficiency. Record keeping, CAM, and emission control testing requirements will determine compliance.  All requirements for this EU have been transferred from the PTI.
K001 K005	81%, by weight, overall VOC reduction efficiency	21-09(B)(6)	N	N	N	Y	N	Y	Y	Y	N	N	Rule requirement for VOC control efficiency is equivalent to, or less stringent than, the VOC emission limitations established under OAC rule 3745-31-05(A)(3) for these emissions units.
K001 K005	Compliance Assurance Monitoring (CAM)	N	40 CFR Part 64	N	N	Y	N	Y	Y	Y	N	N	Permit terms and conditions identify thermal oxidizer combustion chamber temperature and inlet plenum static pressure as CAM Plan indicators to assure compliance with VOC limitations.



**Statement of Basis**  
 Senco Products Inc.  
 Permit Number: P0117584  
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K005	VOC emissions shall not exceed 39.47 TPY	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	Y	N	N	OR: EU subject to coating and cleanup material VOC content and usage restrictions and 81% overall capture and control efficiency. Record keeping, CAM, and emission control testing requirements will determine compliance.  All requirements for this EU have been transferred from the PTI.
K005	VOC emissions from coatings shall not exceed 1.14 lbs VOC/gal., after controls	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	Y	N	N	OR: EU subject to coating VOC content restrictions and 81% overall capture and control efficiency. Record keeping, CAM, and emission control testing requirements will determine compliance.  All requirements for this EU have been transferred from the PTI.
K372	VOC emissions shall not exceed 0.24 ton VOC per month from coatings and cleanup material, over a 12-month rolling period	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	Y	N	OR/St: EU subject to VOC content restriction which was added as a streamlining term in this permit action from the underlying PTI to ensure compliance with the BAT limitation. Record keeping requirements will determine compliance.  ET: Not applicable. Monitoring and record keeping requirements determine compliance.  All requirements for this EU have been transferred from the PTI.
K372	Maximum 3 gallons coating per day	21-09(U)(2)(e)(ii)	N	N	N	Y	N	Y	Y	N	N	N	ET: Not applicable. Monitoring and record keeping requirements determine compliance.
K372	Exempt	17-11(C)	N	Y	N	N	N	N	N	N	N	N	ND: EU is exempt from the particulate emission control limitations in OAC rule 3745-17-11(C) because the paint spray operation employs less than 5 gallons per day, ref.

													OAC rule 3745-17-11(A)(1)(i).
K281 K282	VOC emissions shall not exceed 3.65 TPY from each emissions unit	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: EUs subject to coating VOC content and annual usage restrictions to ensure compliance with the VOC limitation. Record keeping requirements will determine compliance.  ET: Not applicable. Monitoring and record keeping requirements determine compliance.  All requirements for these EUs have been transferred from the PTI.
K283 K284 K285 K287 K288 K289 K296 K301	VOC emissions shall not exceed 1.02 TPY from each emissions unit	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: EUs subject to coating VOC content and annual usage restrictions to ensure compliance with the VOC limitation. Record keeping requirements will determine compliance.  ET: Not applicable. Monitoring and record keeping requirements determine compliance.  All requirements for these EUs have been transferred from the PTI.
K370 K371	VOC emissions shall not exceed 18 lbs/day, from coatings, for each emissions unit.	N	OAC 3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: Not applicable. Daily emission limitation based upon maximum application rate and the Ohio SIP allowable VOC coating content limit of 3.0 lbs VOC/gallon. Monitoring and record keeping requirements for SIP limit will determine compliance.  All requirements for these EUs have been transferred from the PTI.
K370 K371	VOC emissions shall not exceed 4.9 TPY from each emissions unit	N	OAC 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR: EUs subject to VOC content and annual usage restrictions to ensure compliance with the VOC limitation. Record keeping requirements will determine compliance.  ET: Not applicable. Monitoring and record keeping requirements determine compliance.  All requirements for these EUs have been transferred from the PTI.



**Statement of Basis**  
 Senco Products Inc.  
**Permit Number:** P0117584  
**Facility ID:** 1431340977

K370 K371	Coatings applied in these emissions units shall not exceed 3.0 lbs VOC/gallon	21-09(U)(1)(i)	N	N	N	Y	N	Y	Y	N	N	N	ET: Not applicable. Monitoring and record keeping requirements determine compliance.
K343 K344 K345 K346 K348 K350 K351 K352 K353 K354 K355 K356 K357 K359 K360 K362 K363 K364 K365 K369	VOC emissions shall not exceed 2.32 lbs/hr from each emissions unit	N	OAC 3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: Not applicable. Hourly emission limitation based upon maximum application rate and the allowable VOC coating content limit of 5.83 lbs VOC/gallon. Monitoring and record keeping requirements for coating VOC content will determine compliance.  All requirements for these EUs have been transferred from the PTI.
K343 K344 K345 K346 K348 K350 K351 K352 K353 K354 K355 K356 K357	VOC emissions shall not exceed 3.99 TPY from each emissions unit, per rolling 12-month period.	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: EUs subject to VOC content and annual usage restrictions to ensure compliance with the VOC limitation. Record keeping requirements will determine compliance.  ET: Not applicable. Monitoring and record keeping requirements determine compliance.  All requirements for these EUs have been transferred from the PTI.



**Statement of Basis**  
 Senco Products Inc.  
**Permit Number:** P0117584  
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K359 K360 K362 K363 K364 K365 K369													
K343 K344 K345 K346 K348 K350 K351 K352 K353 K354 K355 K356 K357 K359 K360 K362 K363 K364 K365 K369	Exempt	21-09(U)(1)	N	Y	N	N	N	N	N	N	N	N	ND: EU is exempt from the coating limitations in OAC rule 3745-21-09(U) pursuant to PTI 14-1280, issued 10/15/1990, and OAC rule 3745-21-09(U)(2)(f) for approval of alternative limitations due to the application of specialty coating.
K016 thru K109 (various)	Coatings applied in these emissions units shall not exceed 3.5 lbs VOC/gallon	21-09(U)(1)(c)	N	N	N	Y	N	Y	Y	N	N	N	ET: Not applicable. Monitoring and record keeping requirements determine compliance.
K304 K305 K306 K308 K310 K312	VOC emissions shall not exceed 1.97 lbs/hr from each	N	OAC 3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: Not applicable. Hourly emission limitation based upon maximum application rate and the allowable VOC coating content limits. Monitoring and record keeping requirements for coating VOC content will determine compliance.



**Statement of Basis**  
 Senco Products Inc.  
 Permit Number: P0117584  
 Facility ID: 1431340977

K314 K315 K316 K317 K318 K320 K328 K329 K330 K334 K338 K341	emissions unit														All requirements for these EUs have been transferred from the PTI.
K304 K305 K306 K308 K310 K312 K314 K315 K316 K317 K318 K320 K328 K329 K330 K334 K338 K341	VOC emissions shall not exceed 3.99 TPY from each emissions unit, per rolling 12-month period.	N	OAC 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N			OR: EUs subject to VOC content and annual usage restrictions to ensure compliance with the VOC limitation. Record keeping requirements will determine compliance.  ET: Not applicable. Monitoring and record keeping requirements determine compliance.  All requirements for these EUs have been transferred from the PTI.
K304 K305 K306 K308 K310 K312 K314 K315 K316 K317 K318	Exempt	21-09(U)(1)	N	Y	N	N	N	N	N	N	N	N			ND: EU is exempt from the coating limitations in OAC rule 3745-21-09(U) pursuant to PTI 14-1280, issued 10/15/1990, and OAC rule 3745-21-09(U)(2)(f) for approval of alternative limitations due to the application of specialty coating.







**DRAFT**

**Division of Air Pollution Control  
Title V Permit  
for  
Senco Products Inc.**

Facility ID:	1431340977
Permit Number:	P0117584
Permit Type:	Renewal
Issued:	1/12/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
Senco Products Inc.

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	2
1. Federally Enforceable Standard Terms and Conditions .....	3
2. Monitoring and Related Record Keeping and Reporting Requirements.....	3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance.....	6
4. Risk Management Plans .....	7
5. Title IV Provisions .....	7
6. Severability Clause .....	7
7. General Requirements .....	7
8. Fees.....	8
9. Marketable Permit Programs.....	8
10. Reasonably Anticipated Operating Scenarios .....	9
11. Reopening for Cause .....	9
12. Federal and State Enforceability .....	9
13. Compliance Requirements .....	9
14. Permit Shield .....	11
15. Operational Flexibility.....	11
16. Emergencies.....	12
17. Off-Permit Changes .....	12
18. Compliance Method Requirements .....	12
19. Insignificant Activities or Emissions Levels.....	13
20. Permit to Install Requirement.....	13
21. Air Pollution Nuisance .....	13
22. Permanent Shutdown of an Emissions Unit .....	13
23. Title VI Provisions .....	13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only .....	14
25. Records Retention Requirements Under State Law Only.....	14
26. Inspections and Information Requests .....	14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements.....	15
28. Permit Transfers .....	15



29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations .....	15
30. Submitting Documents Required by this Permit .....	16
B. Facility-Wide Terms and Conditions.....	17
C. Emissions Unit Terms and Conditions .....	20
1. F001, WIRE DRAW MILLS .....	21
2. K001, BAND LINE.....	23
3. K005, BAND LINE.....	32
4. K372, AIR GUN FILTERS .....	41
5. Emissions Unit Group - Coil Nail Coaters: K281, K282 .....	49
6. Emissions Unit Group - Collators #6: K370, K371 .....	55
7. Emissions Unit Group - Nail Collators PTI 14-1280: K343, K344, K345, K346, K348, K350, K351, K352, K353, K354, K355, K356, K357, K359, K360, K362, K363, K364, K365, K369.....	62
8. Emissions Unit Group - Staple Machines (No PTI): K016, K019, K022, K025, K028, K033, K037, K043, K044, K045, K052, K055, K057, K058, K061, K062, K067, K068, K070, K073, K074, K076, K078, K080, K086, K087, K088, K090, K091, K099, K100, K102, K103, K105, K106, K107, K109.....	67
9. Emissions Unit Group - Staple Machines PTI 14-1280: K304, K305, K306, K308, K310, K312, K314, K315, K316, K317, K318, K320, K328, K329, K330, K334, K338, K341 .....	71



**Draft Title V Permit**  
Senco Products Inc.  
**Permit Number:** P0117584  
**Facility ID:** 1431340977

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

## Authorization

Facility ID: 1431340977  
Facility Description: Nail and staple manufacturing  
Application Number(s): A0051446  
Permit Number: P0117584  
Permit Description: Renewal of Title V Operating Permit for a nail and staple manufacturing facility, includes wire drawing, band lines, collating, and staple machines.  
Permit Type: Renewal  
Issue Date: 1/12/2016  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0099715

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

Senco Products Inc.  
8450 BROADWELL RD.  
Cincinnati, OH 45244-1611

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

Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219  
(513)946-7777

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 Southwest Ohio Air Quality Agency. 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



**Draft Title V Permit**  
Senco Products Inc.  
**Permit Number:** P0117584  
**Facility ID:** 1431340977  
**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 Southwest Ohio Air Quality Agency. 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency) 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency.
- 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 Southwest Ohio Air Quality Agency. 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency 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.



**Draft Title V Permit**  
Senco Products Inc.  
**Permit Number:** P0117584  
**Facility ID:** 1431340977

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

### **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 Southwest Ohio Air Quality Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the 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.



**Draft Title V Permit**  
Senco Products Inc.  
**Permit Number:** P0117584  
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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 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:

Non-halogenated solvent cold cleaners – L006 through L031

Kohler 100kW Emergency Generator [PBR14250] – P010

Staple machines – K148, K157, K162, K169, K175, K176, K181, K183, K188, K189, K191, K199, K200, K212, K216, K219, K221, K222, K231, K232, K234, K236, K238, K240, K241, K242, and K245 to K251

(Authority for term: OAC rule 3745-77-07(A)(13))

3. The Ohio EPA has determined that the following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines: P010. At this time the Ohio EPA is not accepting the delegating authority to enforce NESHAP standards for area sources. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

(Authority for term: 40 CFR Part 63)

4. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subparts A and IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (NSPS): P010. The complete NSPS requirements, including the NSPS 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.

(Authority for term: 40 CFR Part 60)

5. The Southwest Ohio Air Quality Agency has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions units K001 and K005. The permittee shall comply with the provisions of the plan (as specified in Part C - Terms and Conditions for Emissions Units) during any operation of the aforementioned emissions units.

(Authority for term: 40 CFR Part 64)

6. The following abbreviations are used throughout this permit:

VOC = Volatile organic compounds



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TPY = Ton(s) per year

PTI = Permit to Install

CFR = Code of Federal Regulations

OAC = Ohio Administrative Code

ORC = Ohio Revised Code



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**Permit Number:** P0117584  
**Facility ID:** 1431340977  
**Effective Date:** To be entered upon final issuance

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



**1. F001, WIRE DRAW MILLS**

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

Wire Draw Mills

- 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 3745-17-07(B)	Exempt. See b)(2)a.
b.	OAC rule 3745-17-08(B)	Exempt. See b)(2)b.

- (2) Additional Terms and Conditions

- a. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.
    - b. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

- c) Operational Restrictions

- (1) None.

- d) Monitoring and/or Recordkeeping Requirements

- (1) None.

- e) Reporting Requirements

- (1) None.



**Draft Title V Permit**  
Senco Products Inc.  
**Permit Number:** P0117584  
**Facility ID:** 1431340977

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

- f) Testing Requirements
  - (1) None.
  
- g) Miscellaneous Requirements
  - (1) None.

**2. K001, BAND LINE**

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

Band Line, controlled by 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) (PTI 14-01339)	VOC emissions shall not exceed 5.70 pounds per hour.  See b)(2)a. and c)(1) - c)(4).
b.	OAC rule 3745-21-09(B)(6), as alternative to OAC rule 3745-21-09(U)(1)(b)	The requirements of this rule are equivalent to, or less stringent than, the requirements established pursuant to OAC rule 3745-31-05(A)(3).
c.	40 CFR Part 64  <i>Compliance Assurance Monitoring (CAM)</i>	See b)(2)b., d)(2) - d)(7), e)(2) - e)(3), and f)(2).

- (2) Additional Terms and Conditions

- a. This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve an overall control efficiency of 81 percent, by weight.

- b. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

- c) Operational Restrictions

- (1) The VOC content of coatings employed in this emissions unit shall not exceed 5.92 pounds VOC/gallon.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

- (2) The amount of coatings employed in this emissions unit shall not exceed 5483 gallons per month.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

- (3) The permittee shall employ only acetone as a clean-up material in this emissions unit.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

- (4) The amount of clean-up material (acetone) employed in emissions unit K001 shall not exceed 850 gallons per year based on a rolling, 12-month period.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of the following information:

- a. the name and identification number of each coating employed;
- b. the VOC content of each coating employed (as applied), recorded in pounds of VOC per gallon of coating;
- c. the total number of gallons of each coating employed;
- d. the total number of gallons of all coatings employed;
- e. the name and identification number for each cleanup material employed;
- f. the VOC content of each cleanup material (as applied), recorded in pounds of VOC per gallon;
- g. the total number of gallons of each cleanup material employed;
- h. the total number of gallons of all cleanup material employed; and
- i. the rolling, 12-month summation for the number of gallons of cleanup material employed [the total volume for the current month recorded in (h) plus the total volume for the previous eleven calendar months].

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

- (2) The CAM plan for this emissions unit has been developed for the control of VOC emissions. The CAM performance indicators for control of VOC emissions are the temperature within the combustion chamber of the thermal oxidizer and the static pressure at the inlet plenum to the thermal oxidizer.

Thermal oxidizer system operating parameters (temperature and inlet static pressure) are measured and recorded by continuous monitoring equipment and the associated record keeping requirements in d)(4) and d)(5). The indicator ranges for these parameters are specified in d)(3). When the monitored values for the operating

parameters outside of their respective ranges, corrective action (including, but not limited to, an evaluation of the emissions unit and thermal oxidizer) will be required.

Upon detecting an excursion of the thermal oxidizer system operating parameters, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range(s).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

- (3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable ranges established for the thermal oxidizer system are as follows:
- a. the temperature within the combustion chamber of the thermal oxidizer, for any 3-hour block of time when the emissions unit controlled by the thermal oxidizer is in operation, shall be maintained at a value not more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit was in compliance; and
  - b. the static pressure measured at the inlet plenum to the thermal oxidizer shall be maintained at a value at least 2.7 inches of water or at least 90% of the value recorded during the most recent emissions test that demonstrated the emissions unit was in compliance.

These ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the ranges based upon information obtained during future emission tests that demonstrate compliance with the allowable VOC emission rate for this emissions unit. In addition, approved revisions to the ranges 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), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

- (4) The permittee shall properly operate and maintain equipment to continuously monitor the operating parameters in d)(3) associated with the thermal oxidizer system when the controlled emissions unit is in operation, including periods of startup and shutdown, as follows:
- a. 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 is in operation.



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.

- b. The permittee shall properly install, operate, and maintain equipment to monitor and record the static pressure at the inlet plenum to the thermal oxidizer while the emissions unit is in operation. Units shall be in inches of water. The monitoring and recording equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

- (5) Whenever the monitored values for the thermal oxidizer temperature and/or inlet static pressure varies from the ranges established in accordance with d)(3) of this permit, the permittee shall promptly investigate the cause of the excursion. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the excursion was first observed;
- b. the magnitude of the excursion 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 an excursion, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range 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 excursion 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 excursion ended;
- i. the total period of time (in minutes) during which there was an excursion;
- j. the temperature and/or inlet static pressure readings 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.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

- (6) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring 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 40 CFR Part 64.7)

- (7) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

- (8) 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 14-01339: d)(1) - d)(7). 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.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any exceedance of the coating VOC content limitation specified in c)(1);
  - b. any exceedance of the monthly coating usage limitation specified in c)(2);
  - c. any deviation of the clean-up material usage restriction specified in c)(3); or

- d. any exceedance of the clean-up material usage limitation specified in c)(4).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

- (2) The permittee shall submit quarterly excursion reports that identify the following:
  - a. each period of time (start time and date, and end time and date) when the thermal oxidizer combustion chamber temperature and/or inlet static pressure were outside of the ranges specified in d)(3) and the cause of each incident;
  - b. the date, time, and duration of any downtime of the thermal oxidizer system continuous monitoring equipment (other than downtime associated with QA/QC or other calibration checks) while the emissions unit was in operation and the cause of each incident;
  - c. the corrective action(s) taken for each incident described in (a) and (b);
  - d. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;
  - e. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the combustion chamber temperature and/or inlet static pressure indicator ranges defined in d)(3) into an acceptable range, was determined to be necessary and was not taken; and
  - f. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

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

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 40 CFR Part 64.9)

- (3) If the permittee is required under 40 CFR Part 64.8 and d)(7) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-01339: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this

operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 5.70 pounds per hour.

Applicable Compliance Method:

The hourly emissions limitation above represents the potential to emit at the maximum coating application rate based upon the maximum allowable coating VOC content limitation specified in c)(1) and the overall VOC control efficiency requirement specified in b)(2)a. Compliance with the hourly limit shall be determined from the coating record keeping requirements in d)(1) and the results of the most recent control efficiency performance testing.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to the permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the capture and control efficiency requirements specified in b)(2)a.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

ii. The capture efficiency shall be determined using Methods 20 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the US EPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the

alternative if such approval does not contravene any other applicable requirement.).

- d. The permittee shall record the temperature within the combustion chamber of the thermal oxidizer and the inlet static pressure during each testing run. At a minimum, the temperature and inlet static pressure shall be recorded at 15 minute intervals.
- e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-77-07(C)(1), and 40 CFR Part 64)

- (3) 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 14-01339: f)(1) - f)(2). 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.



**Draft Title V Permit**  
Senco Products Inc.  
**Permit Number:** P0117584  
**Facility ID:** 1431340977

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g) Miscellaneous Requirements

- (1) None.

**3. K005, BAND LINE**

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

Band Line, controlled by 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) (PTI 14-01652)  <i>Netting Determination for VOC</i>	VOC emissions shall not exceed 39.47 TPY.  See b)(2)a. and c)(1) - c)(4).
b.	OAC rule 3745-21-09(B)(6), as alternative to OAC rule 3745-21-09(U)(1)(b)	The requirements of this rule are equivalent to, or less stringent than, the requirements established pursuant to OAC rule 3745-31-05(A)(3).
c.	40 CFR Part 64  <i>Compliance Assurance Monitoring (CAM)</i>	See b)(2)c., d)(2) - d)(7), e)(2) - e)(3), and f)(2).

(2) Additional Terms and Conditions

a. This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve an overall control efficiency of 81 percent, by weight, and a destruction efficiency of at least 90%, by weight.

b. The VOC emissions from coatings shall not exceed 1.14 pounds VOC per gallon of coating, as applied, based upon the coating VOC content limit in c)(1) and the overall control efficiency requirement in b)(2)a.

c. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

c) Operational Restrictions

- (1) The VOC content of coatings employed in this emissions unit shall not exceed 6.0 pounds of VOC/gallon.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

- (2) The amount of coatings employed in this emission unit shall not exceed 5619.9 gallons per month.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

- (3) The VOC content of clean-up materials employed in this emissions unit shall not exceed 6.6 pounds of VOC/gallon.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

- (4) The amount of clean-up material employed shall not exceed 26.25 gallons per month.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:

- a. the name and identification number of each coating employed;
- b. the VOC content of each coating employed (as applied), recorded in pounds of VOC per gallon of coating;
- c. the total number of gallons of each coating employed;
- d. the total number of gallons of all coatings employed;
- e. the name and identification number for each cleanup material employed;
- f. the VOC content of each cleanup material (as applied), recorded in pounds of VOC per gallon;
- g. the total number of gallons of each cleanup material employed;
- h. the total number of gallons of all cleanup material employed;
- i. the monthly VOC emission totals from this emission unit [the summation of (b) x (c) for each coating employed + (f) x (g) for each clean up material employed, multiplied by the overall control efficiency demonstrated during the most recent stack test]; and
- j. the year to date VOC emission totals [the VOC monthly emission total calculated in (i) added to the previous month(s) emission totals recorded in (i)].

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

- (2) The CAM plan for this emissions unit has been developed for the control of VOC emissions. The CAM performance indicators for control of VOC emissions are the temperature within the combustion chamber of the thermal oxidizer and the static pressure at the inlet plenum to the thermal oxidizer.

Thermal oxidizer system operating parameters (temperature and inlet static pressure) are measured and recorded by continuous monitoring equipment and the associated record keeping requirements in d)(4) and d)(5). The indicator ranges for these parameters are specified in d)(3). When the monitored values for the operating parameters outside of their respective ranges, corrective action (including, but not limited to, an evaluation of the emissions unit and thermal oxidizer) will be required.

Upon detecting an excursion of the thermal oxidizer system operating parameters, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range(s).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7)

- (3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable ranges established for the thermal oxidizer system are as follows:
- a. the temperature within the combustion chamber of the thermal oxidizer, for any 3-hour block of time when the emissions unit controlled by the thermal oxidizer is in operation, shall be set at a minimum of 1400 degrees Fahrenheit and maintained at a value not more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit was in compliance; and
  - b. the static pressure measured at the inlet plenum to the thermal oxidizer shall be maintained at a value at least 2.7 inches of water or at least 90% of the value recorded during the most recent emissions test that demonstrated the emissions unit was in compliance.

These ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the ranges based upon information obtained during future emission tests that demonstrate compliance with the

allowable VOC emission rate for this emissions unit. In addition, approved revisions to the ranges 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), OAC rule 3745-31-05(A)(3), and 40 CFR Part 64.3)

- (4) The permittee shall properly operate and maintain equipment to continuously monitor the operating parameters in d)(3) associated with the thermal oxidizer system when the controlled emissions unit is in operation, including periods of startup and shutdown, as follows:

a. 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 is in operation. 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.

b. The permittee shall properly install, operate, and maintain equipment to monitor and record the static pressure at the inlet plenum to the thermal oxidizer while the emissions unit is in operation. Units shall be in inches of water. The monitoring and recording equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

- (5) Whenever the monitored values for the thermal oxidizer temperature and/or inlet static pressure varies from the ranges established in accordance with d)(3) of this permit, the permittee shall promptly investigate the cause of the excursion. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the excursion was first observed;
- b. the magnitude of the excursion 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 an excursion, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the

permittedetermines that corrective action is not necessary and documents the reasons for that determination and the date and time the excursion 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 excursion ended;
- i. the total period of time (in minutes) during which there was an excursion;
- j. the temperature and/or inlet static pressure readings 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.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), 40 CFR Part 64.7, and 40 CFR Part 64.9)

- (6) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring 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 40 CFR Part 64.7)

- (7) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8)

- (8) 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 14-01652: d)(1) - d)(7). 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.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any exceedance of the coating VOC content limitation specified in c)(1);
  - b. any exceedance of the monthly coating usage limitation specified in c)(2);
  - c. any exceedance of the clean-up material VOC content limitation specified in c)(3); or
  - d. any exceedance of the monthly clean-up material usage limitation specified in c)(4).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

- (2) The permittee shall submit quarterly excursion reports that identify the following:
  - a. each period of time (start time and date, and end time and date) when the thermal oxidizer combustion chamber temperature and/or inlet static pressure were outside of the ranges specified in d)(3) and the cause of each incident;
  - b. the date, time, and duration of any downtime of the thermal oxidizer system continuous monitoring equipment (other than downtime associated with QA/QC or other calibration checks) while the emissions unit was in operation and the cause of each incident;
  - c. the corrective action(s) taken for each incident described in (a) and (b);
  - d. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;
  - e. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the combustion chamber temperature and/or inlet static pressure indicator ranges defined in d)(3) into an acceptable range, was determined to be necessary and was not taken; and
  - f. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

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

(Authority for term: OAC rules 3745-77-07(C)(1), 3745-31-05(A)(3), and 40 CFR Part 64.9)

- (3) If the permittee is required under 40 CFR Part 64.8 and d)(7) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9)

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-01652: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 Limitations:

VOC emissions shall not exceed 1.14 pounds VOC per gallon of coating applied.

VOC emissions shall not exceed 39.47 TPY.

Applicable Compliance Method:

The VOC coating emissions limitation in pounds VOC per gallon represents the potential to emit based upon the maximum allowable coating VOC content limitation specified in c)(1) and the overall VOC control efficiency requirement specified in b)(2)a. Compliance with the limit shall be determined from the coating record keeping requirements in d)(1) and the results of the most recent control efficiency performance testing.

Compliance with the annual VOC emissions limitation, in TPY, shall be determined from the summation of the monthly emissions as specified in the record keeping requirement in d)(1) and the results of the most recent control efficiency performance testing.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months prior to the permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the capture and control efficiency requirements specified in b)(2)a.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
    - i. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
    - ii. The capture efficiency shall be determined using Methods 20 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the US EPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.).
  - d. The permittee shall record the temperature within the combustion chamber of the thermal oxidizer and the inlet static pressure during each testing run. At a minimum, the temperature and inlet static pressure shall be recorded at 15 minute intervals.
  - e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
  - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating



parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-77-07(C)(1), and 40 CFR Part 64)

- (3) 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 14-01652: f)(1) - f)(2). 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.

g) **Miscellaneous Requirements**

- (1) None.



**4. K372, AIR GUN FILTERS**

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

Paint booth - Miscellaneous Metal Parts Coating (formerly R001)

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) b)(1)b., d)(4) through d)(7), and e)(2).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008  (PTI P0116099)	VOC emissions shall not exceed 0.24 ton VOC per month from coatings and clean-up material, averaged over a twelve-month rolling period.  See b)(2)a. and c)(1).
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 TPY taking into account the federally enforceable restriction in b)(1)d. below.  See b)(2)b. below.
c.	OAC rule 3745-17-11(C)	Exempt per OAC rule 3745-17-11(A)(1)(i).
d.	OAC rule 3745-21-09(U)(2)(e)(ii)	See b)(2)c.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

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

- c. The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts.

c) Operational Restrictions

- (1) The VOC content of coatings and cleanup materials employed in this emissions unit shall not exceed 5.4 pounds of VOC/gallon.

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

d) Monitoring and/or Recordkeeping Requirements

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

- a. the name and identification number of each coating employed;
- b. the VOC content of each coating employed, in pounds per gallon, as applied;
- c. the number of gallons of each coating employed;
- d. the total number of gallons of all the coatings employed; and
- e. the total VOC emissions from all the coatings employed, in pounds, i.e., the sum of d)(1)b. times d)(1)c. for each coating employed.

The coating usage records shall be maintained for a minimum of 3 years.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-21-09(U)(2) and 3745-77-07(C)(1))

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

- a. the company identification of each cleanup material employed;
- b. the number of gallons of each cleanup material employed;
- c. the VOC content of each cleanup material employed, in pounds per gallon;
- d. the total VOC emissions from all cleanup materials employed, in pounds, i.e., the sum of d)(2)b. times d)(2)c. for each cleanup employed;
- e. if cleanup materials are collected for off-site disposal and/or recovery, the following records shall be maintained if a credit is to be applied to the monthly VOC emissions:
  - i. the amount of cleanup material recovered during the month\* for off-site disposal and/or recovery, in gallons (or pounds, if records of recovered cleanup material is maintained by weight and VOC content in percent by weight);

- ii. the VOC content of the recovered cleanup material shall be based on the lowest VOC content of any cleanup material collected, in pounds per gallon (or percent by weight); or it may be based upon a laboratory analyses provided by the facility to which the waste solvent is shipped;
  - iii. the date the recovered cleanup material was shipped, the amount shipped (minus the container), and the name and address of the receiving, disposal, and/or recovery facility; and
- f. the total monthly VOC emissions from cleanup operations, in pounds, i.e., [d)(2)d.] – [d)(2)e.i. x d)(2)e.ii.].

\* A daily log may be required for recovered waste cleanup solvents, where a record of the monthly total volume or weight of the collected material cannot be accurately maintained. This amount shall be adjusted if the volume or weight shipped is less than the sum of the monthly recovered solvent added to the container.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

- (3) The permittee shall calculate and record the average VOC emissions from coatings and cleanup materials for each month over a twelve month rolling period, i.e., the sum of the monthly VOC emission rate in d)(1)e. plus d)(2)d. or d)(2)f., plus the sum of monthly VOC emission rates from the coating and cleanup materials for the previous 11 calendar months, divided by 2000 pounds/ton, divided by twelve.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

- (4) The PTI application for this emissions unit, K372, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit 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 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 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 emitted from the emissions unit, (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 is/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):

$$\text{TLV}/10 \times 8/X \times 5/Y = 4 \text{ TLV}/XY = \text{MAGLC}$$

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:

Toxic Contaminant: toluene

TLV (mg/m<sup>3</sup>): 75

Maximum Hourly Emission Rate (lbs/hr): 3.19

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 261

MAGLC (ug/m<sup>3</sup>): 1794

The permittee has demonstrated that emissions of toluene from emissions unit K372 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).

(Authority for term: PTI P0116099 and OAC rule 3745-77-07(C)(1))

(5) Prior to making any physical changes to or changes in the method of operation of the emissions unit 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 or its 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 permit to install 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.

(Authority for term: PTI P0116099 and OAC rule 3745-77-07(C)(1))

- (6) 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 or the materials applied.

(Authority for term: PTI P0116099 and OAC rule 3745-77-07(C)(1))

- (7) 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.

(Authority for term: PTI P0116099 and OAC rule 3745-77-07(C)(1))

- (8) 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 P0116099: d)(1) - d)(7). 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.

e) Reporting Requirements

- (1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 3 gallons per day. The notification shall include a copy of such record and shall be sent to the appropriate District Office or local air agency within 45 days after the exceedance occurs.

(Authority for term: OAC rules 3745-21-09(U) and 3745-77-07(C)(1))

- (2) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing an exceedance of the VOC content limitation in c)(1). The notification shall include a copy of such record and shall be sent to the appropriate District Office or local air agency within 45 days after the exceedance occurs.

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

- (3) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the “Toxic Air Contaminate Statute”, ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:

- a. the original model input;
- b. the updated model input;
- c. the reason for the change(s) to the input parameter(s); and
- d. a summary of the results of the updated modeling, including the input changes; and
- e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions unit, or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect. Reports shall be submitted by January 31 of each year.

(Authority for term: PTI P0116099 and OAC rule 3745-77-07(C)(1))

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0116099: e)(1) - e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:

0.24 ton VOC per month from coatings and cleanup material, averaged over a twelve-month rolling period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1) - d)(3).

(Authority for term: OAC rules 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1))
    - (2) USEPA Method 24 shall be used to determine the VOC content for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

(Authority for term: OAC rules 3745-21-04(B), 3745-31-05(A)(3), and 3745-77-07(C)(1))
    - (3) Formulation data or USEPA Method 24 shall be used to determine the VOC content of all cleanup materials.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))
    - (4) 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 P0116099: f)(1) - f)(3). 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.



**Draft Title V Permit**  
Senco Products Inc.  
**Permit Number:** P0117584  
**Facility ID:** 1431340977

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

g) Miscellaneous Requirements

- (1) None.

**5. Emissions Unit Group - Coil Nail Coaters: K281, K282**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K281	Coil Nail Coater, Machine ID 7504
K282	Coil Nail Coater, Machine ID 7508

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) (PTI 14-707)	VOC emissions shall not exceed 3.65 TPY for each emissions unit.  See c)(1) and c)(2).
b.	OAC rule 3745-21-09(U)(1)	The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The maximum VOC content of the coatings employed in each emissions unit shall not exceed 2.77 pounds VOC per gallon

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

(2) The amount of coatings employed in each emissions unit shall not exceed 2640 gallons per year.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information for each month for each emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the VOC content of each coating employed\*, in pounds per gallon, as applied;
  - c. the number of gallons of each coating employed;
  - d. the total number of gallons of all the coatings employed; and
  - e. the year to date total number of gallons of all the coatings employed [the monthly total calculated in (d) added to the previous months usage totals recorded in (d)].

\*If the permittee mixes complying coatings at the emissions unit, it is not necessary to record the VOC content of the resulting mixture.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

- (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 14-707: d)(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.

e) **Reporting Requirements**

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-21-09(B), and 3745-77-07(C)(1))

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. any exceedance of the annual coating usage limitation specified in c)(2).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-707: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 3.65 TPY for each emissions unit.

Applicable Compliance Method:

The above emissions limitation is based upon the maximum allowable coating VOC content of 2.77 pounds of VOC/gallon and the maximum allowable annual coating usage restriction of 2640 gallons per year. Compliance with these restrictions, determined by the record keeping in d)(1), shall demonstrate compliance with the annual emission limitation.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

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

(Authority for term: OAC rules 3745-21-04(B), 3745-31-05(A)(3), and 3745-77-07(C)(1))

- (3) 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 14-707: f)(1) - f)(2). 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.

g) Miscellaneous Requirements

- (1) None.

**2. Emissions Unit Group - Collators #5: K283, K284, K285, K287, K288, K289, K296, K301**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K283	#5 Collator, Machine ID 7402
K284	#5 Collator, Machine ID 7403
K285	#5 Collator, Machine ID 7405
K287	#5 Collator, Machine ID 7406
K288	#5 Collator, Machine ID 7408
K289	#5 Collator, Machine ID 7407
K296	#5 Collator, Machine ID 7602
K301	#5 Collator, Machine ID 7401

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) (PTI 14-834)	VOC emissions shall not exceed 1.02 TPY for each emissions unit.  See c)(1) and c)(2).
b.	OAC rule 3745-21-09(U)(1)	The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The maximum VOC content of the coatings employed in each emissions unit shall not exceed 2.77 pounds VOC per gallon.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

- (2) The amount of coatings employed in each emissions unit shall not exceed 732.8 gallons per year.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information for each month for each emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the VOC content of each coating employed\*, in pounds per gallon, as applied;
  - c. the number of gallons of each coating employed;
  - d. the total number of gallons of all the coatings employed; and
  - e. the year to date total number of gallons of all the coatings employed [the monthly total calculated in (d) added to the previous months usage totals recorded in (d)].

\*If the permittee mixes complying coatings at the emissions unit, it is not necessary to record the VOC content of the resulting mixture.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

- (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 14-834: d)(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.

e) **Reporting Requirements**

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-21-09(B), and 3745-77-07(C)(1))

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any exceedance of the annual coating usage limitation specified in c)(2).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-834: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 1.02 TPY for each emissions unit.

**Applicable Compliance Method:**

The above emissions limitation is based upon the maximum allowable coating VOC content of 2.77 pounds of VOC/gallon and the maximum allowable annual coating usage restriction of 732.8 gallons per year. Compliance with these restrictions, determined by the record keeping in d)(1), shall demonstrate compliance with the annual emission limitation.

(Authority for term: OAC rules 3745-31-05(A)(3), and 3745-77-07(C)(1))

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

(Authority for term: OAC rules 3745-21-04(B), 3745-31-05(A)(3), and 3745-77-07(C)(1))

- (3) 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 14-834: f)(1) - f)(2). 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.

g) **Miscellaneous Requirements**

- (1) None.

**6. Emissions Unit Group - Collators #6: K370, K371**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K370	Angled Brad Machine # 1
K371	Angled Brad Machine # 2

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) d)(2) – d)(5).

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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3) (PTI 14-04939)	VOC emissions shall not exceed 18 pounds/day, from coatings, for each emissions unit.  VOC emissions shall not exceed 4.9 TPY, from coatings and cleanup material, for each emissions unit.  See b)(2)a., c)(1), and c)(2).  Compliance with the requirements of this rule includes compliance with the requirements of OAC rule 3745-21-09(U)(1)(i).
b.	OAC rule 3745-21-09(U)(1)(i)	Coatings applied in the coating operations shall not exceed 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents.

(2) Additional Terms and Conditions

a. The daily VOC emission limitation outlined above is based upon these emissions units potential to emit (PTE) at their maximum hourly application rate of 0.25 gallon/hour. Therefore, no daily records are required to demonstrate compliance with this limitation.

b. The VOC content of the cleanup material employed in these emissions units shall not exceed 6.7 pounds of VOC per gallon of cleanup material.

c) Operational Restrictions

- (1) The VOC content of the cleanup material employed in these emissions units shall not exceed 6.7 pounds of VOC per gallon of cleanup material.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

- (2) The maximum annual coating and cleanup material usage for each emissions unit shall not exceed 2190 gallons per year, excluding water and exempt solvents, for coatings, and 480 gallons per year for cleanup materials.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

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

- a. the name and identification number of each coating, as applied;
- b. the volume, in gallons, of each coating employed, excluding water and exempt solvents;
- c. the VOC content of each coating employed, excluding water and exempt solvents, in pounds per gallon, as applied;
- d. the name and identification of each cleanup material employed;
- e. the volume, in gallons, of each cleanup material employed;
- f. the VOC content of each cleanup material, in pounds per gallon;
- g. the total VOC emission rate for all coatings and cleanup materials employed, in pounds per month  $[(b \times c) + (e \times f)]$ ;
- h. the number of gallons of all coatings employed during the month;
- i. the number of gallons of all cleanup materials employed during the month;
- j. the year to date total number of gallons of all the coatings employed [the monthly total of (h) added to the previous month usage totals recorded in (h)]; and
- k. the year to date total number of gallons of all cleanup materials employed [the monthly total calculated in (i) added to the previous months usage totals recorded in (i)].

(Authority for term: OAC rules OAC rule 3745-21-09(B), 3745-31-05(A)(3), and 3745-77-07(C)(1))

- (2) The permit to install for these emissions units, K370 and K371, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 2-Butoxyethanol

TLV (ug/m3): 97,000

Maximum Hourly Emission Rate (lbs/hr): 2.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 219.8

MAGLC (ug/m3): 2310

(Authority for term: PTI 14-04939 and OAC rule 3745-77-07(C)(1))

- (3) Physical changes to or in the method of operation of the emissions units after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions units or their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

(Authority for term: PTI 14-04939 and OAC rule 3745-77-07(C)(1))

- (4) If the permittee determines that the "Air Toxic Policy" 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 the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

(Authority for term: PTI 14-04939 and OAC rule 3745-77-07(C)(1))

- (5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the “Air Toxic Policy”:
- a. description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and
  - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the “Air Toxic Policy” for the change.

(Authority for term: PTI 14-04939 and OAC rule 3745-77-07(C)(1))

- (6) 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 14-04939: d)(1) – d)(5). 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.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings or cleanup materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-21-09(B), and 3745-77-07(C)(1))

- (2) The permittee shall submit an annual report which identifies any exceedance of the annual coating and cleanup material usage limitations specified in c)(2), as well as corrective actions that were taken to achieve compliance. These reports shall be submitted by January 30 of each year.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-04939: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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:

Coatings applied in the coating operations shall not exceed 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1). The mass of VOC per volume of each coating, excluding water and exempt solvents, as applied, shall be calculated as follows:

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

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

where:

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

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

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

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

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

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

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

$V_{VM}$  = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

$V_w$  = volume fraction of water in coating, in gallon of water per gallon of coating.

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

(Authority for term: OAC rules 3745-21-10(B), 3745-21-09(U), 3745-31-05(A)(3), and 3745-77-07(C)(1))

b. Emission Limitations:

VOC emissions shall not exceed 18 pounds/day, from coatings, for each emissions unit.

VOC emissions shall not exceed 4.9 TPY, from coatings and cleanup material, for each emissions unit.

Applicable Compliance Method:

The pounds per day emission limitation represents the potential to emit based upon the maximum allowable coating VOC content of 3.0 pounds of VOC/gallon and the maximum coating application rate of 0.25 gallon/hour. Compliance with the daily emission limitation is demonstrated based on the coating VOC content record keeping in d)(1).

The annual emission limitation is based upon the maximum allowable coating VOC content of 3.0 pounds of VOC/gallon, the maximum allowable cleanup material VOC content of 6.7 pounds of VOC/gallon, the maximum allowable annual coating usage restriction of 2190 gallons per year, and the maximum allowable annual cleanup material usage restriction of 480 gallons per year. Compliance with these usage and VOC content restrictions, determined by the record keeping in d)(1), shall demonstrate compliance with the annual emission limitation.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))

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

(Authority for term: OAC rules 3745-21-04(B), 3745-31-05(A)(3), and 3745-77-07(C)(1))

- (3) Formulation data or USEPA Method 24 shall be used to determine the VOC content of all cleanup materials.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1))



**Draft Title V Permit**  
Senco Products Inc.  
**Permit Number:** P0117584  
**Facility ID:** 1431340977

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

- (4) 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 14-04939: f)(1) - f)(3). 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.
  
- g) Miscellaneous Requirements
  - (1) None.



**7. Emissions Unit Group - Nail Collators PTI 14-1280: K343, K344, K345, K346, K348, K350, K351, K352, K353, K354, K355, K356, K357, K359, K360, K362, K363, K364, K365, K369**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K343	Nail Collator, Machine ID 7210
K344	Nail Collator, Machine ID 7107
K345	Nail Collator, Machine ID 7404
K346	Nail Collator, Machine ID 7111
K348	Nail Collator, Machine ID 7109
K350	Nail Collator, Machine ID 7112
K351	Nail Collator, Machine ID 7113
K352	Nail Collator, Machine ID 7108
K353	Nail Collator, Machine ID 7022
K354	Nail Collator, Machine ID 7021
K355	Nail Collator, Machine ID 7106
K356	Nail Collator, Machine ID 7101
K357	Nail Collator, Machine ID 7114
K359	Nail Collator, Machine ID 7104
K360	Nail Collator, Machine ID 7105
K362	Nail Collator, Machine ID 7102
K363	Nail Collator, Machine ID 7116
K364	Nail Collator, Machine ID 7115
K365	Nail Collator, Machine ID 7103
K369	Nail Collator, Machine ID 7409

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) (PTI 14-1280)	VOC emissions shall not exceed 2.32 pounds/hour for each emissions unit.  See b)(2)a. and c)(1).  Compliance with the requirements of this rule includes compliance with the requirements of OAC rule 3745-31-05(D)



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D)  Synthetic Minor to Avoid Major Modification New Source Review	VOC emissions shall not exceed 3.99 TPY for each emissions unit, per rolling 12-month period.  See c)(2).
c.	OAC rule 3745-21-09(U)(1)	Exempt under OAC rule 3745-21-09(U)(2)(f). See b)(2)b.

(2) Additional Terms and Conditions

- a. The hourly VOC emission limitation outlined above is based upon these emissions units potential to emit (PTE) at their maximum hourly application rate of 0.398 gallon/hour. Therefore, no hourly records are required to demonstrate compliance with this limitation.
- b. Pursuant to PTI 14-1280, the specialty retention coating VOC content limitation established as Best Available Technology (BAT) pursuant to OAC rule 3745-31-05(A)(3) was determined to be an alternative reasonably available control technology emission limitation and the lowest emission limitation that the emissions units are capable of meeting considering technological and economic feasibility.

c) Operational Restrictions

- (1) The VOC content of the retention coatings employed in these emissions units shall not exceed 5.83 pounds VOC/gallon, excluding water, as applied.  
  
(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))
- (2) The maximum annual retention coating usage for each emissions unit shall not exceed 1371.2 gallons based upon a rolling, 12-month summation of the coating usage figures.  
  
(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D), and 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for each emissions unit
  - a. the name and identification number of each retention coating, as applied;
  - b. the VOC content of each retention coating employed, excluding water, in pounds per gallon, as applied;
  - c. the water content of each retention coating, as applied, in percent by volume;
  - d. the nonvolatile (solids) content of each retention coating, as applied, in percent by volume;

- e. the volume, in gallons, of each retention coating employed, excluding water;
- f. the total volume, in gallons, of all retention coatings employed, excluding water;
- g. the total VOC emission rate for all retention coatings employed, in pounds per month [(b x e)];
- h. the updated rolling 12-month total volume, in gallons, of all retention coatings employed, excluding water [the total volume for the current month recorded in (f) plus the total volume for the previous eleven calendar months]; and
- i. the updated rolling 12-month total VOC emission rate, in tons [the total amount of VOC emissions for the current month recorded in (g) plus the total amount of VOC emissions for the previous eleven calendar months, divided by 2000 pounds/ton].

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D), and 3745-77-07(C)(1))

- (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 14-1280: d)(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.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-21-09(B), and 3745-77-07(C)(1))

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any exceedance of the coating usage limitation specified in c)(2); and
  - b. any exceedance of the 12-month rolling VOC emission limitation in b)(1).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D), and 3745-77-07(C)(1))

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-1280: e)(1) - e)(2). The reporting requirements contained in the above-

referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

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 2.32 pounds/hour for each emissions unit.

Applicable Compliance Method:

The pounds per hour emission limitation represents the potential to emit based upon the maximum allowable coating VOC content of 5.83 pounds of VOC/gallon and the maximum coating application rate of 0.398 gallon/hour. Compliance with the hourly emission limitation is demonstrated based on the coating VOC content record keeping in d)(1).

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77 07(C)(1))

b. Emission Limitation:

VOC emissions shall not exceed 3.99 TPY for each emissions unit, per rolling 12-month period.

Applicable Compliance Method:

The annual VOC emission limitation is based upon the maximum allowable coating VOC content of 5.83 pounds VOC/gallon and the maximum coating usage restriction in c)(2). Compliance with the VOC emission limitation for each emissions unit shall be demonstrated by the record keeping required in d)(1).

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D), and 3745-77 07(C)(1))

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

(Authority for term: OAC rules 3745-21-04(B), 3745-31-05(A)(3), and 3745-77-07(C)(1))

(3) 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 14-1280: f)(1) - f)(2). The testing requirements contained in the above-referenced



**Draft Title V Permit**  
Senco Products Inc.  
**Permit Number:** P0117584  
**Facility ID:** 1431340977

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

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.

g) Miscellaneous Requirements

- (1) None.

**8. Emissions Unit Group - Staple Machines (No PTI): K016, K019, K022, K025, K028, K033, K037, K043, K044, K045, K052, K055, K057, K058, K061, K062, K067, K068, K070, K073, K074, K076, K078, K080, K086, K087, K088, K090, K091, K099, K100, K102, K103, K105, K106, K107, K109**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K016	Staple Machine, Machine ID 3357
K019	Staple Machine, Machine ID 3004
K022	Staple Machine, Machine ID 3347
K025	Staple Machine, Machine ID 3361
K028	Staple Machine, Machine ID 3002
K033	Staple Machine, Machine ID 3356
K037	Staple Machine, Machine ID 3337
K043	Staple Machine, Machine ID 3103
K044	Staple Machine ID #3373
K045	Staple Machine ID #3328
K052	Staple Machine ID #3372
K055	Staple Machine ID #3345
K057	Staple Machine ID #3364
K058	Staple Machine ID #3325
K061	Staple Machine ID #3376
K062	Staple Machine ID #3344
K067	Staple Machine ID #3322
K068	Staple Machine SN-S00478
K070	Staple Machine ID #3362
K073	Staple Machine ID #3324
K074	Staple Machine ID #3346
K076	Staple Machine ID #3363
K078	Staple Machine ID #3102
K080	Staple Machine ID #3001
K086	Staple Machine ID #3334
K087	Staple Machine ID #3342
K088	Staple Machine ID #3005
K090	Staple Machine ID #3333
K091	Staple Machine ID #3321
K099	Staple Machine ID #3351
K100	Staple Machine ID #3365
K102	Staple Machine ID #3354
K103	Staple Machine ID #3104
K105	Staple Machine ID #3343
K106	Staple Machine ID #3377
K107	Staple Machine ID # LAB/ENG
K109	Staple Machine ID #3367

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 3745-21-09(U)(1)(c)	Coatings applied in the coating operations shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

(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 each month for the emissions units and shall maintain this information at the facility for a period of three years:

- a. the name and identification number of each coating, as applied; and  
 b. the pounds of VOC per gallon of each coating, excluding water and exempt solvents, as applied.

This information does not have to be kept on a line-by-line basis. If the permittee mixes complying coatings at the emissions unit, it is not necessary to record the VOC content of the resulting mixture.

(Authority for term: OAC rules 3745-21-09(B)(3), OAC rule 3745-21-10(B)(8), and 3745-77-07(C)(1))

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-21-09(B)(3) and 3745-77-07(C)(1))

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:

Coatings applied in the coating operations shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1). The mass of VOC per volume of each coating, excluding water and exempt solvents, as applied, shall be calculated as follows:

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

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

where:

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

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

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

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

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

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

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

$V_{VM}$  = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

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

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



(Authority for term: OAC rules 3745-21-10(B), 3745-21-09(U), and 3745-77-07(C)(1))

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

(Authority for term: OAC rules 3745-21-04(B) and 3745-77-07(C)(1))

g) Miscellaneous Requirements

- (1) None.

**9. Emissions Unit Group - Staple Machines PTI 14-1280: K304, K305, K306, K308, K310, K312, K314, K315, K316, K317, K318, K320, K328, K329, K330, K334, K338, K341**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K304	Staple Machine, Machine ID 3335
K305	Staple Machine, Machine ID 3374
K306	Staple Machine, Machine ID 3329
K308	Staple Machine, Machine ID 3355
K310	Staple Machine, Machine ID 3341
K312	Staple Machine, Machine ID 3336
K314	Staple Machine, Machine ID 3326
K315	Staple Machine, Machine ID 3327
K316	Staple Machine, Machine ID 3332
K317	Staple Machine, Machine ID 3352
K318	Staple Machine, Machine ID 3331
K320	Staple Machine, Machine ID 3375
K328	Staple Machine, Machine ID 3003
K329	Staple Machine, Machine ID 3101
K330	Staple Machine, Machine ID 3105
K334	Staple Machine, Machine ID 3371
K338	Staple Machine, Machine ID 3366
K341	Staple Machine, Machine ID 3323

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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3) (PTI 14-1280)	VOC emissions shall not exceed 1.97 pounds/hour for each emissions unit. See b)(2)a. and c)(1).  Compliance with the requirements of this rule includes compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D)  Synthetic Minor to Avoid Major Modification New Source Review	VOC emissions shall not exceed 3.99 TPY for each emissions unit, per rolling 12-month period. See c)(2).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-09(U)(1)	Exempt under OAC rule 3745-21-09(U)(2)(f). See b)(2)b.

(2) Additional Terms and Conditions

- a. The hourly VOC emission limitation outlined above is greater than the emissions units potential to emit (PTE) at their maximum hourly application rates of 0.334 gallon/hour for retention and unitizing coatings and 0.214 gallon/hour for lubricant coatings. Therefore, no hourly records are required to demonstrate compliance with this limitation.
- b. Pursuant to PTI 14-1280, the specialty retention and unitizing coating VOC content limitation established as Best Available Technology (BAT) pursuant to OAC rule 3745-31-05(A)(3) was determined to be an alternative reasonably available control technology emission limitation and the lowest emission limitation that the emissions units are capable of meeting considering technological and economic feasibility.

c) Operational Restrictions

- (1) The VOC content of the retention and unitizing coatings employed in these emissions units shall not exceed 5.75 pounds VOC/gallon, excluding water, as applied, and the VOC content of the lubricant coatings employed in these emissions units shall not exceed 0.22 pound VOC/gallon, excluding water, as applied.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

- (2) The maximum annual retention and unitizing coating usage for each emissions unit shall not exceed 1386 gallons based upon a rolling, 12-month summation of the combined retention and unitizing coating usage figures. The maximum annual lubricant coating usage for each emissions unit shall not exceed 482 gallons based upon a rolling, 12-month summation of the lubricant coating usage figures.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D), and 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for each emissions unit
  - a. the name, type (retention, unitizing, lubricant), and identification number of each coating, as applied;
  - b. the VOC content of each coating employed, excluding water, in pounds per gallon, as applied;
  - c. the water content of each coating, as applied, in percent by volume;



- d. the nonvolatile (solids) content of each coating, as applied, in percent by volume;
- e. the volume, in gallons, of each coating employed, excluding water;
- f. the total volume, in gallons, of all coatings employed, excluding water;
- g. the total VOC emission rate for all coatings employed, in pounds per month [(b x e)];
- h. the updated rolling 12-month total volume, in gallons, of all coatings employed, excluding water [the total volume for the current month recorded in (f) plus the total volume for the previous eleven calendar months]; and
- i. the updated rolling 12-month total VOC emission rate, in tons [the total amount of VOC emissions for the current month recorded in (g) plus the total amount of VOC emissions for the previous eleven calendar months, divided by 2000 pounds/ton].

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D), and 3745-77-07(C)(1))

- (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 14-1280: d)(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.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-21-09(B), and 3745-77-07(C)(1))

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any exceedance of the coating usage limitation specified in c)(2); and
  - b. any exceedance of the 12-month rolling VOC emission limitation in b)(1).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D), and 3745-77-07(C)(1))

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-1280: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
- 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 1.97 pounds/hour for each emissions unit.
- Applicable Compliance Method:
- The pounds per hour emission limitation is based upon the maximum allowable coating VOC content of 5.75 pounds of VOC/gallon and the maximum coating application rate of 0.334 gallon/hour, added to the maximum allowable lubricant VOC content of 0.22 pound VOC/gallon and the maximum lubricant application rate of 0.214 gallon/hour. Since the emissions units are not capable of applying coatings and lubricants simultaneously, the hourly emission limitation is greater than the potential to emit. Compliance with the hourly emission limitation is demonstrated based on the coating VOC content record keeping in d)(1).
- (Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77 07(C)(1))
- b. Emission Limitation:
- VOC emissions shall not exceed 3.99 TPY for each emissions unit, per rolling 12-month period.
- Applicable Compliance Method:
- The annual VOC emission limitation is based upon the maximum allowable coating VOC content of 5.75 pounds VOC/gallon and the maximum coating usage restriction in c)(2). Compliance with the VOC emission limitation for each emissions unit shall be demonstrated by the record keeping required in d)(1).
- (Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D), and 3745-77 07(C)(1))



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

(Authority for term: OAC rules 3745-21-04(B), 3745-31-05(A)(3), and 3745-77-07(C)(1))

- (3) 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 14-1280: f)(1) - f)(2). 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.

g) Miscellaneous Requirements

- (1) None.