



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

2/17/2016

Certified Mail

Charles Hamilton  
Centria  
530 N 2nd St  
Cambridge, OH 43725

Facility ID: 0630010006  
Permit Number: P0089310  
County: Guernsey

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 Daily Jeffersonian. 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 Ohio EPA DAPC, Southeast District Office  
2195 Front Street  
Logan, OH 43138

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 Ohio EPA DAPC, Southeast District Office at (740)385-8501.

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*  
Ohio EPA-SEDO; Pennsylvania; West Virginia



## 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  
Centria

530 North Second Street, , Cambridge, OH 43725

ID#: P0089310

Date of Action: 2/17/2016

PermitDesc: Title V renewal permit for a metal coil coating facility..

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: Scott Winograd, Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138. Ph: (740)385-8501





**Statement of Basis**  
 Centria  
 Permit Number: P0089310  
 Facility ID: 0630010006

## Statement of Basis For Air Pollution Title V Permit

Facility ID:	0630010006
Facility Name:	Centria
Facility Description:	Coil Coating
Facility Address:	530 North Second Street, Cambridge, OH 43725
Permit #:	P0089310, 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 checked="" type="checkbox"/> Single Hazardous Air Pollutant <input checked="" type="checkbox"/> Combined Hazardous Air Pollutants <input checked="" 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.
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 document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



**Statement of Basis**  
 Centria  
 Permit Number: P0089310  
 Facility ID: 0630010006

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)	
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.	K001

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

Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
None.			



**C. Emissions Unit Terms and Conditions**

**Key:**  
 EU = emissions unit ID  
 ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)  
 OR = operational restriction  
 M = monitoring requirements  
 ENF = did noncompliance issues drive the monitoring requirements?  
 R = record keeping requirements  
 Rp = reporting requirements  
 ET = emission testing requirements (not including compliance method terms)  
 St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement  
 Misc = miscellaneous requirements

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
K001	VOC emissions shall not exceed 108.4 lbs/hr and 8.3 lbs/gallon maximum VOC content for all coatings, as applied. The annual VOC emission shall not exceed 145.5 TPY. Emissions from the combustion of natural gas in the 8.7 mmBtu/hr oven burner shall not exceed 1.10 lbs/hr of NOx and		OAC rule 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	Y	N	N	



	1.35 lbs/hr of CO												
K001	VOC shall not exceed 4.0 lbs/gallon of solids	3745-21-09(E)		N	N	Y	N	Y	Y	N	N	N	ET – Compliance is demonstrated through recordkeeping.
K001	Each coil coating affected source must limit HAP emissions to no more than 2% of		40 CFR Part 63, Subpart SSSS	N	Y	Y	N	Y	Y	Y	N	N	



**Statement of Basis**

Centria

Permit Number: P0089310

Facility ID: 0630010006

	the organic HAP applied for each month during each 12-month compliance period (98% reduction)													
K001	Compliance Assurance Monitoring (CAM)		40 CFR Part 64	N	Y	Y	N	Y	Y	Y	N	N		
K001														For informational purposes only (company has not requested a non-applicability determination per OAC rule 3745-77-02(H)): Centria is a coil coating facility located in Guernsey County. Centria owns and operates K001, a McKay coil coating line that was originally installed in 1966. In 1995, Centria applied for and obtained a permit (see PTI 06-4458) to increase the line speed of K001. As part of this project, Centria installed a thermal oxidizer. VOC emissions decreased with this project and CO and NOx emissions increased. Because VOC emissions did not increase 40 CFR Part 60, Subpart TT was not triggered. K001 is subject to 40 CFR Part 63, Subpart SSSS. K001 is also subject to 40 CFR Part 64, OAC rule 3745-21-09(E) and OAC rule 3745-31-05(A)(3).





**DRAFT**

**Division of Air Pollution Control  
Title V Permit  
for  
Centria**

Facility ID:	0630010006
Permit Number:	P0089310
Permit Type:	Renewal
Issued:	2/17/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
Centria

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**Draft Title V Permit**

Centria

**Permit Number:** P0089310

**Facility ID:** 0630010006

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

## Authorization

Facility ID: 0630010006  
Facility Description:  
Application Number(s): A0020565, A0020566  
Permit Number: P0089310  
Permit Description: Title V renewal permit for a metal coil coating facility.  
Permit Type: Renewal  
Issue Date: 2/17/2016  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0089309

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

Centria  
530 North Second Street  
Cambridge, OH 43725

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

Ohio EPA DAPC, Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740)385-8501

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



**Draft Title V Permit**  
Centria  
**Permit Number:** P0089310  
**Facility ID:** 0630010006  
**Effective Date:** To be entered upon final issuance

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Southeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

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

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

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

federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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

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

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

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

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

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

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

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

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control

system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

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

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

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

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

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

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

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

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

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

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

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

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

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

revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
  - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

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

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

**8. Fees**

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

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

**9. Marketable Permit Programs**

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

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

**10. Reasonably Anticipated Operating Scenarios**

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

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

**11. Reopening for Cause**

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

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

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

## 12. Federal and State Enforceability

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

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

## 13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Southeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
- (2) Compliance certifications shall include the following:
  - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
  - b. The permittee's current compliance status.
  - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
  - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
  - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

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

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

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

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

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Southeast District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in

response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Southeast District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

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

## **16. Emergencies**

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

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

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

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

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

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

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

**18. Compliance Method Requirements**

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

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

**19. Insignificant Activities or Emissions Levels**

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

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

**20. Permit to Install Requirement**

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

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

**21. Air Pollution Nuisance**

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

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

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

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

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



Unless otherwise exempted, noemissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

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

**23. Title VI Provisions**

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

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

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

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

The permittee shall submit required reports in the following manner:

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

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

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

**26. Inspections and Information Requests**

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

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

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

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

**28. Permit Transfers**

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

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

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

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

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

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

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

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



**Draft Title V Permit**

Centria

**Permit Number:** P0089310

**Facility ID:** 0630010006

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

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



**Draft Title V Permit**

Centria

**Permit Number:** P0089310

**Facility ID:** 0630010006

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

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.



**Draft Title V Permit**

Centria

**Permit Number:** P0089310

**Facility ID:** 0630010006

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

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

**1. K001, McKay Coil Coating Paint Line, 60" wide**

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

Production line which includes coil cleaning, prime paint coating and finish paint coating controlled by a thermal oxidizer with 99.9% capture and 99.7% control

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as established in PTI 06-4458, issued 8/17/1995	<p>Volatile organic compound (VOC) emissions shall not exceed 108.4 lbs/hr and 8.30 lbs/gallon maximum VOC content for all coatings, as applied.</p> <p>The annual VOC emissions shall not exceed 145.5 TPY.</p> <p>Emissions from the combustion of natural gas in the 8.7 mmBtu/hr oven burner shall not exceed 1.10 lbs/hr of nitrogen oxides (NO<sub>x</sub>) and 1.35 lbs/hr of carbon monoxide (CO).</p> <p>Compliance with this rule also includes compliance with OAC rule 3745-21-09(E).</p>
b.	OAC rule 3745-21-09(E)	VOC emissions shall not exceed 4.0 lbs/gallon of solids.
c.	<p>40 CFR Part 63, Subpart SSSS            40 CFR 63.5080 – 63.5209</p> <p>[In accordance with 40 CFR 63.5090(a), this facility is a major source of hazardous air pollutants (HAPs) operating a coil coating line, demonstrating compliance through the use of a capture system and control device.]</p>	<p>Each coil coating affected source must limit organic HAP emissions to no more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98% reduction).</p> <p>[63.5120 (a)(1)]</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR 63.1-15	Table 2 to Subpart SSSS of 40 CFR Part 63 – Applicability of General Provisions to Subpart SSSS shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
e.	40 CFR, Part 64 – Compliance Assurance Monitoring (CAM)	See c)(1)-(2), d)(1)-(3), and e)(3) below.

(2) Additional Terms and Conditions

- a. The permittee shall comply with all applicable additional terms and conditions under 40 CFR Part 63, Subpart SSSS, including the following sections:

63.5100	The affected source subject to this subpart is the collection of all the coil coatings lines at the facility.
63.5110	Definitions.
63.5130(a)	For an existing affected source, the compliance date is 3 years after June 10, 2002.
63.5140(a)	You must be in compliance with the standards in this subpart at all times, except during periods of start-up, shutdown, and malfunction of any capture system and control device used to comply with this subpart.
63.5140(b)	Table 2 cross references to subpart A of this part indicating the General Provisions requirements to this subpart.
63.5200	Authority delegation.

*(Authority for term: 40 CFR Part 63, Subpart SSSS)*

c) Operational Restrictions

- (1) The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

The most recent stack test was conducted on November 29-30, 2005, and demonstrated an overall control efficiency of 98.74%. During the testing, the oxidizer temperature was maintained at 1,300 degrees Fahrenheit.

*(Authority for term: OAC rules 3745-31-05(A)(3), 3745-77-07, 40 CFR Part 63, Subpart SSSS, and 40 CFR Part 64)*



- (2) The permittee shall operate the thermal oxidizer any time the emissions unit is in operation.

*(Authority for term: OAC rules 3745-31-05(A)(3), 3745-77-07, 40 CFR Part 63, Subpart SSSS and 40 CFR Part 64)*

- (3) The permittee shall comply with all applicable operational restrictions under 40 CFR Part 63, Subpart SSSS, including the following sections:

63.5121(a)	You must meet the applicable operating limits specified in Table 1 to Subpart SSSS. Operating limits must be established during the performance test according to 63.5160(d)(3). You must meet the operating requirements at all times after you establish them.
Table 1 to Subpart SSSS of Part 63	<p>Table 1 to Subpart SSSS of Part 63 – Operating Limits if Using Add-on Control Devices and Capture System:</p> <p>You must meet the following limit:</p> <p>Thermal Oxidizer: The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 63.5160(d)(3)(i).</p> <p>And you must demonstrate continuous compliance with the operating limit by:</p> <ul style="list-style-type: none"> <li>i. Collecting the combustion temperature data according to 63.5150(a)(3);</li> <li>ii. reducing the data to 3-hour block averages; and</li> <li>iii. maintaining the 3-hour average combustion temperature at or above the temperature limit.</li> </ul>

*(Authority for term: 40 CFR Part 63, Subpart SSSS)*

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

*(Authority for term: OAC rules 3745-31-05(A)(3), 3745-77-07, 40 CFR Part 63, Subpart SSSS, and 40 CFR Part 64)*

- (2) The permittee shall collect and record the following information for each day for the coating line and control equipment:
- a. the name and identification number of each coating, as applied;
  - b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
  - c. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
  - d. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied.

The controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph c. above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;

- e. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
- f. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance;
- g. the VOC content of each coating, as applied, in pounds of VOC per gallon;
- h. the total uncontrolled VOC emission rate for all coatings, in pounds per day, (i.e., the summation of the volume of each coating from paragraph (b) multiplied by the corresponding VOC coating content from paragraph (g));
- i. the calculated, controlled VOC emission rate, in pounds per day. The controlled VOC emission rate shall be calculated using the value from paragraph (h) and the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;
- j. the total number of hours the emissions unit was in operation; and
- k. the average hourly VOC emission rate for all coatings, i.e., the value from paragraph (i)/the value from paragraph (j), in pounds per hour (average).

*(Authority for term: OAC rules 3745-31-05(A)(3), 3745-21-09(E), 3745-77-07, 40 CFR Part 63, Subpart SSSS, and 40 CFR Part 64)*

- (3) The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
- a. the name and identification of each cleanup material employed;
  - b. the number of gallons of each cleanup material employed;
  - c. the VOC content of each cleanup material, in pounds per gallon;
  - d. the calculated, controlled VOC emission rate from all cleanup materials, in pounds or tons;
  - e. the total volume of solids from all the coatings employed, in gallons;
  - f. the total VOC emissions from all the coatings employed (i.e., the calculated, controlled VOC emission rate times the total volume of solids from all coatings employed in the line), in pounds or tons; and
  - g. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons.

*(Authority for term: OAC rules 3745-31-05(A)(3), 3745-77-07, 40 CFR Part 63, Subpart SSSS, and 40 CFR Part 64)*

- (4) The permittee shall comply with all applicable monitoring and/or recordkeeping requirements under 40 CFR Part 63, Subpart SSSS, including the following sections:

63.5150(a)	Monitor and inspect each capture system and each control device required to comply with 63.5120 following the date on which the initial performance test of the capture system and control device is completed. You must install and operate the monitoring equipment as specified in (a)(1)-(4).
63.5150(a)(3)	Monitor control device operating parameters.
63.5150(a)(3)(i)	Install, calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months; or must be replaced. Each temperature monitoring device must be equipped with a continuous recorder. The device must have an accuracy of +/- 1 percent of the temperature being monitored in degrees Celsius, or +/- 1 degree Celsius, whichever is greater.
63.5150(a)(3)(ii)	For an oxidizer other than a catalytic oxidizer, to demonstrate continuous compliance with the operating limit established according to 63.5160(d)(3)(i), you must install the thermocouple or temperature sensor in the combustion chamber at a location in the combustion zone.

63.5150(a)(4)	Develop a capture system monitoring plan containing the information specified in 63.5150(a)(4)(i)-(iii). Monitor the capture system in accordance with 63.5150(a)(4)(iii).
63.5150(a)(4)(i)	Monitoring plan must identify the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures.
63.5150(a)(4)(ii)	Monitoring plan must specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with 63.5120. The operating limits must represent the conditions indicative of proper operation and maintenance of the capture system.
63.5150(a)(4)(iii)	Conduct monitoring in accordance with the plan.
63.5150(b)	Any deviation from the required operating parameters which are monitored in accordance with 63.5150(a)(3) and (4), unless otherwise excused, will be considered a deviation from the operating limit.
63.5190(a)	Maintain the records specified in 63.5190(a) and (b) in accordance with 63.10(b)(2).
63.5190(a)(1)	Records of the coating lines on which you used each compliance option and the time periods (beginning and ending dates and times) you used each option.
63.5190(a)(2)	Measurements needed to determine compliance with this subpart (see 63.5190(a)(2)(i)-(vi)).
63.5190(a)(2)(ii)	Control device and capture system operating parameter data in accordance with 63.5150(a)(1), (3), and (4).
63.5190(a)(2)(iii)	Organic HAP content data for the purpose of demonstrating compliance in accordance with 63.5160(b).
63.5190(a)(2)(iv)	Volatile matter and solids content data for the purpose of demonstrating compliance in accordance with 63.5160(c).
63.5190(a)(2)(v)	Overall control efficiency determination or alternative outlet HAP concentration using capture efficiency tests and control device destruction or removal efficiency tests in accordance with 63.5160(d), (e), and (f).
63.5190(a)(2)(vi)	Material usage, HAP usage, volatile matter usage and solids usage and compliance demonstrations using these data in

	accordance with 63.5170(a), (b), and (d).
63.5190(a)(3)	Records specified in 63.10(b)(3)
63.5190(a)(4)	Additional records specified in 63.10(c) for each continuous monitoring system operated by the owner or operator in accordance with 63.5150(a)(2).
63.5190(b)	Maintain records of all liquid-liquid material balances that are performed in accordance with the requirements of 63.5170.

*(Authority for term: 40 CFR Part 63, Subpart SSSS)*

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

- (2) The permittee shall notify the Director (the Ohio EPA, Southeast District Office) of any daily record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southeast District Office) within 45 days after the exceedance occurs.

*(Authority for term: OAC rules 3745-21-09(E) and 3745-77-07)*

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance;
  - b. each day during which the average hourly VOC emissions from the coatings exceeded 108.4 lbs/hr, and the actual average hourly VOC emissions for each such day; and
  - c. any record showing the use of noncomplying coatings (i.e., any coating that exceeds the maximum VOC content limitation of 8.30 pounds per gallon).

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), 3745-77-07, and 40 CFR Part 64)*

- (4) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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

- (5) The permittee shall comply with all applicable reporting requirements under 40 CFR Part 63, Subpart SSSS, including the following sections:

63.5180(a)	Submit reports in accordance with 63.5180(b)-(i).
63.5180(b)	Submit an initial notification required in 63.9(b).
63.5180(b)(1)	Submit an initial notification for an existing source no later than 2 years after June 10, 2002.
63.5180(b)(3)	A Title V application may be used in lieu of the initial notification required under 63.9(b), provided the same information is contained in the permit application as required by 63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.
63.5180(c)	Submit a Notification of Performance Test.
63.5180(d)	Submit a Notification of Compliance Status.
63.5180(e)	Submit performance test reports.
63.5180(f)	Submit start-up, shutdown and malfunction (SSM) reports.
63.5180(f)(1)	If your actions during SSM of an affected source are not completely consistent with the procedures specified in the source's SSM plan specified in 63.6(e)(3), you must state such information in the report. Report must consist of a letter containing the name, title and signature of the responsible official (RO) who is certifying its accuracy that will be submitted to the Administrator.
63.5180(f)(2)	Separate SSM reports are not required if the information is included in the report specified in 63.5180(g).
63.5180(g)	You must submit semi-annual compliance reports containing the information in 63.5180(g)(1)-(2).
63.5180(g)(1) and (g)(i)-(v)	Compliance report dates.
63.5180(g)(2)	The semiannual reports must contain the following information:

63.5180(g)(2)(i)	Company name and address.
63.5180(g)(2)(ii)	Statement by a RO with that official's name, title and signature, certifying the accuracy of the content of the report.
63.5180(g)(2)(iii)	Date of the report and beginning and ending dates of the reporting period.
63.5180(g)(2)(iv)	Identification of the compliance option or options that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning dates you used each option.
63.5180(g)(2)(v)	A statement that there were no deviations from the standards during the reporting period, and that no CEMS were inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
63.5180(h)	If not using a CEMS, you must submit for each deviation occurring at an affected source, the semi-annual compliance report containing the information in 63.5180(g)(2)(i)-(iv) and (h)(1)-(3).
63.5180(h)(1)	The total operating time of each affected source during the reporting period.
63.5180(h)(2)	Number, duration, and cause of deviations (including unknown cause) as applicable, and the corrective action(s) taken.
63.5180(h)(3)	Number, duration and cause of monitor downtime incidents (including unknown cause other than downtime associated with zero span and other daily calibration checks, if applicable).

*(Authority for term: 40 CFR Part 63, Subpart SSSS)*

f) **Testing Requirements**

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

a. **Emission Limitation:**

VOC emissions shall be limited to 108.4 lbs/hr.



Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2) and the emission testing requirements specified in section f)(3).

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

b. Emission Limitation:

VOC emissions shall be limited to 8.30 lbs/gallon maximum VOC content for all coatings, as applied.

Applicable Compliance Method:

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

If required, VOC emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

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

c. Emission Limitation:

The annual VOC emissions shall be limited to 145.5 TPY.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3).

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

d. Emission Limitation:

Emissions from the combustion of the natural gas in the 8.7 mmBtu/hr oven burner shall not exceed 1.10 lbs/hr of NO<sub>x</sub>.

Applicable Compliance Method:

Compliance with the emission limitation of 1.10 lbs/hr of NO<sub>x</sub> may be demonstrated by dividing the applicable AP-42, 5th Edition (supplement B) emission factor for NO<sub>x</sub> from table 1.4-2 (2/98) (for units with heat input capacities less than 100 mmBtu/hr) by the conversion factor of 1020 (to convert from lbs/million cubic feet to lbs/mmBtu), and multiplying by the emissions unit's maximum heat input capacity (8.7 mmBtu/hr):



(100 lbs of NO<sub>x</sub>/million cubic feet) /1,020 (to covert from lbs/million cubic feet to lb(s)/mmBtu) = 0.098 lb/mmBtu X 8.7mmBtu/hr = 0.85 lb/hr.

If required, NO<sub>x</sub> emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

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

e. Emission Limitation:

Emissions from the combustion of the natural gas in the 8.7 mmBtu/hr oven burner shall not exceed 1.35 lbs/hr of CO.

Applicable Compliance Method:

Compliance with the emission limitation of 1.35 lbs/hr of CO may be demonstrated by dividing the applicable AP-42, 5th Edition (supplement B) emission factor for CO from table 1.4-2 (2/98) (for units with heat input capacities less than 100 mmBtu/hr) by the conversion factor of 1020 (to covert from lbs/million cubic feet to lbs/mmBtu), and multiplying by the emissions unit's maximum heat input capacity (8.7 mmBtu/hr):

(84 lbs of CO/million cubic feet) /1,020 (to covert from lbs/million cubic feet to lb(s)/mmBtu) = 0.082 lb/mmBtu X 8.7mmBtu/hr = 0.71 lb/hr.

If required, CO emissions shall be determined according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

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

f. Emission Limitation:

VOC emissions shall not exceed 4.0 lbs/gallon of solids.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2) and the emission testing requirements specified in section f)(3).

*(Authority for term OAC rules 3745-31-09(E) and 3745-77-07)*

g. Emissions Limitation:

Each coil coating affected source must limit organic HAP emissions to no more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98% reduction).

Applicable Compliance Method:

Compliance shall be demonstrated by the testing required in f)(3).

*(Authority for term: 40 CFR Part 63, Subpart SSSS)*

- (2) The permittee shall comply with all applicable testing requirements under 40 CFR Part 63, Subpart SSSS, including the following sections:

Table 1 to 63.5160 (2. Using a capture system and add-on control device)	Conduct a performance test for each capture and control system to determine:  (1) the destruction or removal efficiency of each control device according to 63.5160(d), and  (2) the capture efficiency of each capture system according to 63.5160(e).
63.5160(b)	You must determine the organic HAP weight fraction of each coating material applied by following one of the procedures in paragraphs (b)(1)-(4) of this section.
63.5160(b)(1)	U.S. EPA Method 311
63.5160(b)(2)	U.S. EPA Method 24
63.5160(b)(3)	Alternative method with Administrator approval.
63.5160(b)(4)	Formulation data.
63.5160(c)	You must determine the solids content of each coating material applied using a listed approved method.
63.5160(d)	You must conduct a performance test to establish the destruction or removal efficiency of the control device or the outlet HAP concentration achieved by the oxidizer, according to the methods in 63.5160(d)(1)-(2). During the test, you must establish operating limits required by 63.5121 according to 63.5160(d)(3).
63.5160(e)	If you are required to determine capture efficiency to meet the requirements of 63.5170(e)(2), f)(1)-(2), (h)(2)-(4) or (i)(2)-(3), you must determine capture efficiency using the procedures in 63.5160(e)(1), (2), or (3) of this section, as applicable.

<p>Table 1 to Subpart SSSS of Part 63</p>	<p>Table 1 to Subpart SSSS of Part 63 – Operating Limits if Using Add-on Control Devices and Capture System:</p> <p>You must meet the following limit:</p> <p>Thermal Oxidizer: The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 63.5160(d)(3)(i).</p> <p>And you must demonstrate continuous compliance with the operating limit by:</p> <ul style="list-style-type: none"> <li>i. collecting the combustion temperature data according to 63.5150(a)(3);</li> <li>ii. reducing the data to 3-hour block averages; and</li> <li>iii. maintaining the 3-hour average combustion temperature at or above the temperature limit.</li> </ul>
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*(Authority for term: 40 CFR Part 63, Subpart SSSS)*

- (3) The permittee shall conduct, or have conducted, VOC emission testing for this emissions unit to (1) determine the overall control efficiency of the control equipment serving this emissions unit to demonstrate compliance with the 4.0 lbs of VOC/gallon of solids emission limitation and (2) to determine compliance with the 108.4 lbs/hr emission limitation in accordance with the following requirements:
- a. The emission testing shall be conducted within 60 days after issuance of this permit and within 6 months prior to permit expiration.
  - b. The emissions testing shall be conducted in accordance with 40 CFR Part 63, Subpart SSSS.
  - c. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 25, and 40 CFR Part 51, Appendix M, Method 204.
  - d. The test(s) shall be conducted while this emissions unit is venting VOC emissions to the thermal oxidizer. The emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.

The overall control efficiency of the control equipment serving this emissions unit shall be demonstrated based upon the results of the capture efficiency and control efficiency tests specified above. The capture efficiency shall be determined using Methods 204 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 USEPA's "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.) 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 1.a.ii above and OAC rule 3745-21-10. 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.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. 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, Southeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Southeast District Office 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.

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 Ohio EPA, Southeast District Office 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 Ohio EPA, Southeast District Office.

*(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07, 40 CFR Part 63, Subpart SSSS, and 40 CFR Part 64)*

g) Miscellaneous Requirements

- (1) None.