



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

4/4/2016

Mr. Jon Mangles
 B & C Research
 842 NORTON AVE
 Barberton, OH 44203

Certified Mail

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1677020154
 Permit Number: P0120268
 Permit Type: Administrative Modification
 County: Summit

Dear Permit Holder:

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

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: ARAQMD



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
B & C Research**

Facility ID: 1677020154
Permit Number: P0120268
Permit Type: Administrative Modification
Issued: 4/4/2016
Effective: 4/4/2016
Expiration: 1/20/2020



**Division of Air Pollution Control
Permit-to-Install and Operate**

for
B & C Research

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Final Permit-to-Install and Operate
B & C Research
Permit Number: P0120268
Facility ID: 1677020154
Effective Date: 4/4/2016

Authorization

Facility ID: 1677020154
Application Number(s): M0003817, M0003836
Permit Number: P0120268
Permit Description: Administrative Modification of Permit to Install and Operate (PTIO) P0107888 issued final on April 5, 2011 requested by the facility to incorporate identical permit language that was used in the recently issued PTIO P0119487 for the thermal oxidizer terms and conditions for the Electrostatic Coating Line, emissions unit K002. An additional administrative modification to PTIO P0119487 issued final on October 6, 2015 requested by Akron Regional Air Quality Management District to incorporate OAC rule 3745-21-26 into emissions unit K003.
Permit Type: Administrative Modification
Permit Fee: \$100.00
Issue Date: 4/4/2016
Effective Date: 4/4/2016
Expiration Date: 1/20/2020
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

B & C Research
842 NORTON AVE
Barberton, OH 44203

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

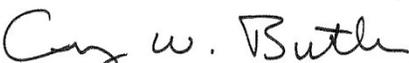
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0120268

Permit Description: Administrative Modification of Permit to Install and Operate (PTIO) P0107888 issued final on April 5, 2011 requested by the facility to incorporate identical permit language that was used in the recently issued PTIO P0119487 for the thermal oxidizer terms and conditions for the Electrostatic Coating Line, emissions unit K002. An additional administrative modification to PTIO P0119487 issued final on October 6, 2015 requested by Akron Regional Air Quality Management District to incorporate OAC rule 3745-21-26 into emissions unit K003.

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

Emissions Unit ID:	P006
Company Equipment ID:	DuraBright EVO Paint Kitchen
Superseded Permit Number:	P0119487
General Permit Category and Type:	Not Applicable

Group Name: DuraBright Paint Booths

Emissions Unit ID:	K002
Company Equipment ID:	DuraBright EVO Clear Coat Paint Booth #2
Superseded Permit Number:	P0107888
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	DuraBright EVO Clear Coat Paint Booth #1
Superseded Permit Number:	P0119487
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
B & C Research
Permit Number: P0120268
Facility ID: 1677020154
Effective Date: 4/4/2016

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



Final Permit-to-Install and Operate
B & C Research
Permit Number: P0120268
Facility ID: 1677020154
Effective Date: 4/4/2016

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Final Permit-to-Install and Operate
B & C Research
Permit Number: P0120268
Facility ID: 1677020154
Effective Date: 4/4/2016

C. Emissions Unit Terms and Conditions

1. P006, DuraBright EVO Paint Kitchen

Operations, Property and/or Equipment Description:

DuraBright EVO Paint Kitchen

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 6/30/2008	Employ a thermal oxidizer with a design control efficiency of at least ninety per cent, by weight, for the VOC emissions vented to the control equipment. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/2008	The Best Available Technology (BAT) requirements do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons per year. See b)(2)c. below.
c.	OAC rule 3745-114-01	See d)(5) through d)(8) and e)(3) below.

(2) Additional Terms and Conditions

- a. VOC emissions from this emissions unit shall be vented to a thermal oxidizer that shall meet the operational, monitoring and record keeping requirements of this permit, when the emissions unit is in operation.
- b. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. 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) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit controlled by the thermal oxidizer is in operation, shall not be less than 1,500 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance.
- (2) 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, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The continuous temperature monitoring and recording devices shall be capable of accurately measuring the desired parameter, and the owner or operator shall properly operate and maintain the devices in accordance with the manufacturer's recommendations. The permittee shall collect and record the following information each day the emissions unit is in operation:
 - a. all 3-hour blocks of time, when the emissions unit controlled by the thermal oxidizer was in operation, during which the average combustion temperature within the thermal oxidizer was less than 1500 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment and the associated emissions unit.

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

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

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

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

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

- (4) The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.
- (5) The Permit to Install and Operate application A0054100 for emissions units, K003 and P006, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air

Contaminant Statute”, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions units, (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 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 units, 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 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(s):

Toxic Contaminant: methanol

TLV (mg/m³): 260

Maximum Hourly Emission Rate (lb/hr): 0.84

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 787

MAGLC (ug/m³): 6190

The permittee, has demonstrated that emissions of methanol, from emissions units K003 and P006, is calculated to be less than eighty per cent of the 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).

- (6) Prior to making any physical changes to or changes in the method of operation of the emissions units, 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 TLV than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO 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.

- (7) 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 MAGLC for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
 - (8) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
 - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
 - (2) The permittee shall identify in the annual PER the following information concerning the operations of the thermal oxidizer during the 12-month reporting period for this emissions unit:
 - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the thermal oxidizer;
 - c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

- (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual PER. If no changes to the emissions, emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect.
 - (4) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- f) Testing Requirements
- (1) 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 180 days after initial startup.
 - b. The emission testing shall be conducted to demonstrate compliance with the control efficiency limitation for VOC.
 - c. 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. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. 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.
 - e. 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).



- f. 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.
 - g. 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.
- (2) 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:

Employ a thermal oxidizer with a design control efficiency of at least ninety per cent, by weight, for the VOC emissions vented to the control equipment.

Applicable Compliance Method:

Compliance with the allowable control efficiency for VOC above shall be based on the results of emission testing conducted in accordance with the methods as outlined in f)(1) above.
- g) Miscellaneous Requirements
- (1) None.

2. Emissions Unit Group - DuraBright Paint Booths: K002, K003

EU ID	Operations, Property and/or Equipment Description
K002	DuraBright EVO Clear Coat Paint Booth #2 with a 800,000 Btu/hour Natural Gas Fired Cure Oven that is shared with emissions unit K003 and controlled with a thermal oxidizer.
K003	DuraBright EVO Clear Coat Paint Booth #1 with a 800,000 Btu/hour Natural Gas Fired Cure Oven that is shared with emissions unit K002 and controlled with a thermal oxidizer.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	For emissions unit K002, the volatile organic compound (VOC) emissions shall not exceed 1.14 pounds per hour and 4.99 tons per year.
b.	OAC rule 3745-31-05(A)(3), as effective 6/30/2008	For emissions unit K003, the requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-26(C)(3). See b)(2)b. below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/2008	For emissions unit K003, the Best Available Technology (BAT) requirements do not apply to the VOC emissions from this air contaminant source since the potential to emit is less than 10 tons per year taking into account federally

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		enforceable requirements in OAC rule 3745-21-09(B)(6). See b)(2)c. below.
d.	OAC rule 3745-17-11(C)	See c)(1), c)(2) and d)(7) through d)(11) below.
e.	OAC rule 3745-21-09(B)(6)	For emissions unit K002: In lieu of complying with the pounds of VOC per gallon of solids limitations contained in paragraph (U) of OAC rule 3745-21-09, the permittee shall demonstrate that the capture and control equipment provide not less than an eighty one per cent reduction, by weight, in the overall VOC emissions from the coating line and that the control equipment has an efficiency of not less than ninety per cent, by weight, for the VOC emissions vented to the control equipment. For any source located in Summit county subject to paragraph (U) of OAC rule 3745-21-09, the requirement to comply with paragraph (U) of OAC rule 3745-21-09 shall terminate at such time the source becomes subject to and complies with rule 3745-21-26 of the Administrative Code. See b)(2)a. below.
f.	OAC rule 3745-21-26(C)(3)	By October 15, 2016 for emissions unit K002 and upon the initial startup date for emissions unit K003, the add-on air pollution control equipment shall achieve a minimum overall VOC control efficiency of ninety per cent. Such add-on air pollution control equipment shall meet paragraph (F) of OAC rule 3745-21-26. The permittee shall comply with the following terms and conditions by October 15, 2016 for emissions unit K002 and upon the initial startup date for emissions unit K003: c)(3), d)(4), d)(5)



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		and d)(6). Additionally, the permittee shall continue to comply with terms and conditions b)(2)a., d)(2) except that the records must be maintained for 5 years and e)(1). See b)(2)a. below.
g.	OAC rule 3745-114-01	For emissions unit K003, see d)(12) through d)(15) and e)(4) below.

(2) Additional Terms and Conditions

- a. VOC emissions from this emissions unit shall be vented to the thermal oxidizer that shall meet the operational, monitoring and record keeping requirements of this permit, when one or more of the emissions units are in operation.
- b. For emissions unit K003, this Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. For emissions unit K003, 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) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for each emissions unit listed above for the control of particulate emissions whenever the emissions unit(s) is/are in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (3) Work practices shall be used to minimize VOC emissions from mixing operations, storage tanks and other containers, and handling operations for coatings, thinners, cleaning materials and waste materials. Work practices shall include, but are not limited to, the following:
 - a. Store all VOC containing coatings, thinners, coating related waste and cleaning materials in closed containers.

- b. Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste and cleaning materials are kept closed at all times except when depositing or removing these materials.
 - c. Minimize spills of VOC containing coatings, thinners, coating related waste and cleaning materials.
 - d. Convey VOC containing coatings, thinners, coating related waste and cleaning materials from one location to another in closed containers or pipes.
 - e. Minimize VOC emissions from the cleaning of application, storage, mixing and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is in operation, shall not be less than 1,500 degrees Fahrenheit or shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.
 - (2) The permittee shall properly install, operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The continuous temperature monitoring and recording devices shall be capable of accurately measuring the desired parameter, and the owner or operator shall properly operate and maintain the devices in accordance with the manufacturer's recommendations. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
 - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was less than 1500 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment and the associated emissions unit(s).
- These records shall be maintained at the facility for a period of three years.
- (3) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

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

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

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

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

- (4) The combustion temperature shall be monitored continuously.
- (5) In addition to d)(2) above, the permittee shall record the key operating parameters for the control equipment, including but not limited to, the following information:
 - a. On a daily basis, the combustion temperature, as appropriate, pursuant to paragraph (F)(3) of OAC rule 3745-21-26.

- b. Daily hours of operation.
 - c. All maintenance performed including the date and type of maintenance.
- (6) All records made to determine compliance with OAC rule 3745-21-26 shall be maintained for five years from the date such record is created and shall be made available to the director or any authorized representative of the director within ninety days of a request.
- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (8) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (9) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter for each emissions unit listed above while the emissions unit(s) listed above is/are shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (10) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the emissions unit identification number;
 - b. the date of the inspection;
 - c. a description of each/any problem identified and the date it was corrected;
 - d. a description of any maintenance and repairs performed; and
 - e. the name of person who performed the inspection.

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

- (11) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications

made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

- (12) The Permit to Install and Operate application A0054100 for emissions units, K003 and P006, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the 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 units, 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 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(s):

Toxic Contaminant: methanol

TLV (mg/m³): 260

Maximum Hourly Emission Rate (lb/hr): 0.84

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 787

MAGLC (ug/m³): 6190

The permittee, has demonstrated that emissions of methanol, from emissions units K003 and P006, is calculated to be less than eighty per cent of the 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).

- (13) Prior to making any physical changes to or changes in the method of operation of the emissions units, 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 TLV than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO 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.

- (14) 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 MAGLC for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (15) 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.
- (16) For emissions unit K002, the permittee shall collect and record the following information for each day the emissions unit is in operation:
- a. the name and identification number of each coating and cleanup material, as applied;
 - b. the VOC content of each coating and cleanup material, as applied, in pounds per gallon;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the total number of hours the emissions unit was in operation;
 - e. the uncontrolled VOC emission rate, in pounds per day, i.e., summation of (b x c) for all coatings employed + summation of (b x c) for all cleanup materials employed;
 - f. the controlled VOC emissions from all coatings and cleanup materials employed, i.e., “e” x (1 - x*); and
 - g. the average hourly controlled VOC emission rate, in pounds per hour (average), i.e., (f/d).

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

*The overall control efficiency determined for emissions unit K002 during the most recent demonstration of compliance. Overall control efficiency means the efficiency of a VOC emission control system, calculated as the product of the capture system and control device efficiencies, expressed as a percentage.

e) Reporting Requirements

- (1) The permittee shall submit quarterly summaries of the following records:
 - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was less than 1500 degrees Fahrenheit or was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit was in compliance; and
 - b. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment and the emissions unit(s).

These quarterly reports shall be submitted by April 30, July 31, October 31 and January 31, and shall cover the records for the previous calendar quarters.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual PER the following information concerning the operations of the thermal oxidizer during the 12-month reporting period for the emissions units listed above:
 - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range/limit;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;
 - c. each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s).
- (4) For emissions unit K003, the permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with

the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual PER. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

- (5) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
 - (6) The permittee shall notify the Ohio EPA district office or local air agency in writing within thirty days following the completion of any of the following:
 - a. The completion of installation and initial use of a VOC emission control system for the subject coating line.
 - b. The completion of installation and initial use of any monitoring devices required under paragraph (C)(3) of OAC rule 3745-21-26 for the subject coating line.
 - c. The completion of any compliance testing conducted in accordance with f)(3) below to demonstrate compliance with the applicable control requirements.
 - (7) The compliance certification in e)(6) above shall provide the following, where applicable:
 - a. A description of the requirements.
 - b. A description of the VOC emission control system.
 - c. A description of the monitoring devices.
 - d. A description of the records that document continuing compliance.
 - e. The results of any compliance tests, including documentation of test data.
 - f. The results of any records that document continuing compliance, including calculations.
 - g. A statement by the owner or operator as to whether the subject coating line has complied with the requirements.
- 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:

For emissions unit K002, VOC emissions shall not exceed 1.14 pounds per hour and 4.99 tons per year.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in d)(16) above.

If required, compliance with the hourly allowable VOC emission limitation above shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1 - 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix.

The annual VOC emission limitation above was developed by multiplying the hourly VOC emission limitation by 8760 hours per year, and then dividing by 2000. Therefore, compliance with the annual VOC emission limitation shall be demonstrated if compliance with the hourly VOC emission limitation is maintained.

b. Emission Limitation:

The capture and control system shall provide not less than an 81 percent reduction, by weight, in the overall VOC emissions from the coating line and the reduction efficiency of the thermal oxidizer shall not be less than 90 percent, by weight, for the VOC emissions vented to it.

Applicable Compliance Method:

If required, compliance with both the overall control and destruction efficiencies shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1 - 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A and Methods 204 through 204F, as specified, in 40 CFR Part 51, Appendix M.

c. Emission Limitation:

The add-on air pollution control equipment shall achieve a minimum overall VOC control efficiency of ninety per cent.

Applicable Compliance Method:

Compliance with the overall control efficiency shall be demonstrated based on the results of emission testing conducted in accordance with f)(2) below.

(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 by January 13, 2017 for emissions unit K002 and within 180 days after initial startup for emissions unit K003.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency for VOC.

- c. 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.)
 - d. 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.
 - e. For the purpose of demonstrating compliance with the emission control requirements of paragraph (C)(3) of OAC rule 3745-21-26, the emissions unit shall be run at typical operating conditions and flow rates compatible with scheduled production during any emission testing.
 - 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.
- (3) In addition, the Ohio EPA may accept the results of an emission test conducted prior to the effective date of OAC rule 3745-21-26, if the permittee provides information and data to the Ohio EPA which demonstrate that the test was witnessed by the Ohio EPA or local air agency, that an approved USEPA emission test method was employed, and that the operation of the process was consistent with the current operating conditions and operating capacity.

- (4) Additional testing of a subject coating line and its VOC add-on air pollution control equipment in accordance with f)(2) above may be required by the director to ensure continued compliance.
 - (5) USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
- g) Miscellaneous Requirements
- (1) None.