Ohio Environmental Protection Agency

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

5/24/2016

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Crown Cork & Seal
Facility ID: 0448010466
Permit Type: Renewal
Permit Number: P0119927

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-2835 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

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

Cc: Toledo Department of Environmental Services

PROPOSED

Division of Air Pollution Control
Title V Permit
for
Crown Cork & Seal

Facility ID:	0448010466
Permit Number:	P0119927
Permit Type:	Renewal
Issued:	5/24/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Crown Cork & Seal

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Authorization

Facility ID:	0448010466
Facility Description:	Metal coil coating facility.
Application Number(s):	A0054840
Permit Number:	P0119927
Permit Description:	Title V renewal permit for a metal coil coating facility.
Permit Type:	Renewal
Issue Date:	5/24/2016
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0088137

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

Crown Cork & Seal
5201 Enterprise Blvd
Toledo, OH 43612

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

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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 Toledo Department of Environmental Services. 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

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 recordingsfor 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 submittedscheduled 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 Toledo Department of Environmental Services. 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services 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 permitexcept 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

Officialthat, 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services) 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 intermittentconsistent 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services 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 beencertified 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 theToledo Department of Environmental Services.

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 Toledo Department of Environmental Services. 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 Toledo Department of Environmental Services 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 Toledo Department of Environmental Services 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 ofan 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 Toledo Department of Environmental Services, 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.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) none

2. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart TT: K004 and K005. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Toledo Division of Environmental Services.

3. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart SSSS: K004 and K005. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Toledo Division of Environmental Services.

4. Pursuant to 40 CFR Part 64, the permittee has submitted and the Ohio EPA has approved compliance assurance monitoring plan for the emissions units K004 and K005 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

C. Emissions Unit Terms and Conditions

1. K004, 2nd coater - 36 inch coil coating line (South Coater)

Operations, Property and/or Equipment Description:

36 inch coil coating line with 16 mmBtu per hour direct-fired natural gas drying oven, permanent total enclosure, and 4 mmBtu per hour catalytic incinerator

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0105928 issued 3/10/2010)	Carbon monoxide (CO) emissions shall not exceed 1.65 pound per hour and 7.2 tons per year.
		Nitrogen oxides (NO_x) emissions shall not exceed 2.0 pounds per hour and 8.8 tons per year.
		Particulate emissions (PE) shall not exceed 0.09 pound per hour and 0.4 ton per year.
		Sulfur dioxide (SO_2) emissions shall not exceed 0.01 pound per hour and 0.05 ton per year.
		Volatile organic compounds (VOC) emissions, including emissions from cleanup materials, shall not exceed 39.0 pounds per hour and 170.9 tons per year.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
		See b)(2)a through b)(2)c.
b.	40 CFR Part 60, Subpart A (40 CFR 63.1 – 19)	See b)(2)f.
c.	40 CFR Part 60, Subpart TT (40 CFR 60.460 – 466) [In accordance with 40 CFR 60.462(a), this emissions unit is a	Emissions shall not exceed 0.28 kilogram of VOC per liter (kg VOC/l) of coating solids applied each calendar month if no control device is used; or
		Emissions shall not exceed 0.14 kg VOC/l

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	metal coil coating line subject to the emission limitations and control measures specified in this section.]	of coating solids applied for each month a control device is continuously used and operated at the most recently demonstrated overall control efficiency; or
		Emissions shall not exceed 10 percent of the VOCs applied (90 percent VOC emission reduction) when a control device is continuously used and operated at the most recently demonstrated overall control efficiency; or
		Emissions shall not exceed a value between 0.14 (or a 90-percent emission reduction) and 0.28 kg VOC/l of coating solids applied for each calendar month for each affected facility that intermittently uses an emission control device operated at the most recently demonstrated overall control efficiency.
		See b)(2)g.
d.	OAC rule 3745-17-07(A)(1)	See b)(2)d.
e.	OAC rule 3745-17-11(A)(2)	See b)(2)e.
f.	OAC rule 3745-18-06(A)	See b)(2)e.
g.	OAC rule 3745-21-09(E) and OAC rule 3745-21-09(B)(6)	See b)(2)e.
h.	40 CFR Part 63, Subpart A (40 CFR 63.1 – 16)	Table 2 of 40 CFR Part 63, Subpart SSSS provides cross-references, indicating which parts of the General Provisions apply.
i.	40 CFR Part 63, Subpart SSSS (40 CFR 63.5080 – 5201) [This metal coil coating line is subject to the emission standards in 63.5120.]	The permittee must limit organic HAP emissions to the level specified below:No more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction); or No more than 0.046 kilogram of organic HAP per liter of solids applied during each 12-month compliance period; or If an oxidizer is used to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume on a dry basis is achieved and the efficiency of the capture system is 100 percent.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
j.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM) (64.1 – 64.10) [In accordance with 40 CFR 64.2, this is a pollutant specific emissions unit located at a major source that is subject to a VOC emission limitation and has potential pre-control device emissions greater than 100 tons per year.]	See c)(1) – c)(3), d)(1) – d)(3), e(1) and e)(2).

(2) Additional Terms and Conditions

a. The permittee shall operate and maintain a permanent total enclosure and a catalytic incinerator to capture and control the VOC emissions.

b. The permittee shall maintain a minimum of 90% overall control efficiency for the VOC emissions from this emissions unit.

c. The permanent total enclosure shall capture 100% of the VOC emitted by the coating applicator.

d. Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule

e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

f. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.

g. The permittee has chosen to comply with the 90 percent emission reduction requirement, so additional monitoring, record keeping and reporting requirements to demonstrate compliance with the other emission standards under this rule are not necessary.

c) Operational Restrictions

(1) This emissions unit shall be totally enclosed such that all the VOC emissions are captured for venting to the catalytic incinerator. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:

a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Administrator;

b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;

c. the average facial velocity (FV) of air through all the NDO's shall be at least 3,600 meters per hour (200 feet per minute);

d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water as a 3-hour average;

e. the direction of air flow through all NDO's shall be into the enclosure;

f. all access doors and windows whose areas are not included in c)(1)b. and are not included in the calculations in c)(1)c shall be closed during routine operation of the process; and

g. all VOC emissions from the coating line must be captured and contained for discharge to the catalytic incinerator.

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

(2) The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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

(3) The permittee shall develop and implement an inspection and maintenance plan for the catalytic oxidizer serving this emissions unit. The plan must address, at a minimum, the following elements.

a. Annual sampling and analysis of the catalyst activity (i.e., conversion efficiency) following the manufacturer's or catalyst supplier's recommended procedures.

b. Monthly inspection of the oxidizer system including the burner assembly and fuel supply lines for problems; and,

c. Annual internal and monthly external visual inspection of the catalyst bed to check for channeling, abrasion, and settling. If problems are found, the permittee shall take corrective action consistent with the manufacturer's recommendations and conduct a new performance test to determine destruction efficiency according to 40 CFR 63.5160.

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

(4) The permittee shall only burn natural gas as fuel in this emissions unit.

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

(5) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart SSSS, including the following sections:

63.5121(a)	establishes capture and control device operating limits to be met at all times

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart SSSS]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record each day, all 3-hour blocks of time during which the permanent total enclosure was not maintained at an average differential pressure of at least 0.007 inch of water column whenever the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(2) The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. These devices shall have an accuracy of plus or minus 2.5 degrees Celsius or plus or minus 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater, pursuant to the requirements specified in 40 CFR 60.464(c). The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(3) 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 catalytic incinerator was/were in operation, during which the average temperature of the exhaust gases immediately before the catalyst bed was below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance;

(Note: This requirement requires reporting on a more stringent basis than that required under OAC rule 3745-21-09(B)(4)(b)(iii) since the permittee has requested to monitor on the same basis as that required under 40 CFR 63.5160(d)(3)((ii)(C).)

b. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; and

c. a log or record of the operating time for the capture (collection) system, catalytic incinerator, monitoring equipment, and the associated emissions unit(s).

The permittee may use a temperature chart recorder or equivalent recording device as the log that documents the temperature differential across the catalyst bed.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(B)(4)(b), and 40 CFR Part 64]

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

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 total uncontrolled VOC emissions from all coatings, in pounds per day;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the uncontrolled VOC content of each cleanup material, in pounds per gallon;

g. the total uncontrolled VOC emissions from all cleanup materials, in pounds per day;

h. the total number of hours the emissions unit was in operation;

i. the average hourly uncontrolled VOC emissions from all coatings and cleanup materials, i.e., (c+g)/h, in pounds per hour (average); and

j. the average hourly controlled VOC emissions from all coatings and cleanup materials, in pounds per hour, calculated using 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.

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

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

a. the calculated, controlled VOC emissions from all coatings and cleanup materials, in tons per month, calculated using d)(4)c, d)(4)g 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; and

b. the rolling, 12 month summation of VOC emissions from all coatings and cleanup materials, in tons.

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

(6) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(7) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart SSSS, including the following sections:

63.5150(a)(1)	Bypass monitoring for intermittently-controllable work stations
63.5150(a)(2)	Continuous emission monitoring system (CEMS) requirements if using a CEMS to demonstrate compliance
63.5150(a)(3)	Temperature monitoring of oxidizers
63.5150(a)(4)	Capture system monitoring
63.5160(d)(3)(ii)(D)	Catalytic oxidizer inspection and maintenance plan
63.5170(a)	If using as-purchased compliant coatings
63.5170(b)	If using as-applied compliant coatings
63.5170(c)	If using capture and control device to reduce emissions to no more than allowable limit
63.5170(d)	If using capture and control to achieve the emission rate limit
63.5170(e)	If using solvent recovery to demonstrate compliance
63.5170(f)	Use of oxidation to demonstrate compliance
63.5170(g)	If using a combination of capture and control

63.5190(a)(1)	Beginning and ending dates of each compliance option used
63.5190(a)(2)	Records of all measurements needed to demonstrate compliance
63.5190(a)(3)	Records specified in 63.10(b)(3)
63.5190(a)(4)	Records if using CEMS
63.5190(a)(5)	Records of liquid-liquid material balances

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart SSSS]

(8) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart TT, including the following sections:

60.463(b)	Monthly performance test requirement
60.463(c)(2)	Determining overall reduction efficiency
60.464(c)	Catalytic incinerator temperature monitoring requirements
60.465(e)	Catalytic incinerator temperature recordkeeping requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60 Subpart TT]

(9) The permittee received permission from U.S. EPA by letter dated March 8, 2010 to implement the compliance method described in 40 CFR 63.5160(d)(3) to demonstrate compliance with 40 CFR Part 60, Subpart TT. The permittee may only use this method for demonstrating compliance with 40 CFR Part 60, Subpart TT when performing skim coating at this emissions unit. At all other times, the permittee is required to demonstrate compliance with 40 CFR Part 60, Subpart TT using both the catalyst bed inlet temperature and temperature difference requirement.

The permittee is still required to record and report the temperature difference across the catalyst bed during skim coating operations to maintain compliance with the record keeping and reporting requirements of 40 CFR Part 60, Subpart TT. However, compliance during skim coating operations can be demonstrated using only the catalyst bed inlet temperature accompanied by the operation and maintenance plan and annual catalyst activity testing specified under 40 CFR 63.5160(d)(3)(ii)(D).

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

(10) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # P0105928, issued on March 10, 2010:d)(8) and d)(9). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

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

a. each day during which the calculated, controlled VOC emission rate exceeded 39.0 pounds per hour;

b. each month during which the calculated, controlled VOC emission rate exceeded 170.9 tons per year as rolling, 12-month summation of the monthly emissions;

c. all 3-hour blocks of time during which the permanent total enclosure was not maintained at an average differential pressure of at least 0.007 inch of water column when the emissions unit was in operation;

d. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was below the average temperature established during the most recent emission tests that demonstrated the emissions unit(s) was/were in compliance; and

e. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference established during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance.

f. The permittee shall submit the results of the monthly catalytic incinerator inspections required under c)(3) that are completed during the reporting period.

g. The permittee shall submit the results of the annual catalyst activity test(s) required by c)(3) in the last quarterly report for each year, along with a summary of the results of the annual inspection of the internal integrity of the catalytic incinerator required by c)(3).

If no deviations/excursions occurred during a calendar quarter, the report shall state that no deviations occurred during the reporting period.

[OAC rule 3745-15-03(B)(1)(b), OAC rule 3745-15-03(C), OAC rule 3745-21-09(B)(4)(c), OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(2) The permittee shall submit quarterly summaries of the following records:

a. any records of downtime (date and length of time) for the capture (collection) system, the catalytic incinerator, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and

b. a log of the operating time for the capture system, catalytic incinerator, monitoring equipment, and the emissions unit(s).

[Authority for term: OAC rule 3745-21-09(B)(4)(c), OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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

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

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

(5) The permittee shall submit semiannual reports and such other notifications and reports to the Toledo Division of Environmental Services and EPA Region 5 as are required pursuant to 40 CFR Part 63, Subpart SSSS, per the following sections:

63.5180(a)	Submit reports to EPA Region 5 and Toledo Division of Environmental Services
63.5180(c)	Notification of Performance Test
63.5180(e)	Performance Test Report
63.5180(f)	Start-up shutdown and malfunction reports
63.5180(g)	Semi-annual compliance reports
63.5180(h)	Deviation reports if not using a CEMS
63.5180(i)	Deviation reports if using a CEMS

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart SSSS]

(6) The permittee shall submit semiannual reports and such other notifications and reports to the Toledo Division of Environmental Services as are required pursuant to 40 CFR Part 60, Subpart TT, per the following sections:

60.465(d)	semi-annual incinerator temperature deviation reports

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60 Subpart TT]

(7) 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 rule 3745-77-07(C)(1)]

(8) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #P0105928, issued on march 10, 2010: e)(6) through e)(7). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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

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

VOC emissions, including emissions from cleanup materials, shall not exceed 39.0 pounds per hour.

Applicable Compliance Method:

If required, the permittee shall perform additional emissions tests, conducted in accordance with USEPA Methods 1 through 4 and 25 of 40 CFR Part 60, Appendix A, and methods and procedures of OAC rule 3745-21-10(C). Alternative U.S. EPA-approved compliance methods may be used with prior approval from the Ohio EPA.

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

b. Emission Limitation:

VOC emissions, including emissions from cleanup materials, shall not exceed 170.9 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon a rolling, 12-month summation of the monthly VOC emissions calculated in d)(5).

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

c. Emission Limitation:

CO emissions shall not exceed 1.65 pounds per hour.

Applicable Compliance Method:

Compliance may be determined through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 84 pounds of CO emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot and multiply the resultant by the maximum burner capacity of 20 mmBtu per hour.

If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with methods and procedures specified in Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved compliance methods may be used with prior approval from the Ohio EPA.

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

d. Emission Limitation:

CO emissions shall not exceed 7.2 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable CO emission limitation (1.65 pounds per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

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

e. Emission Limitation:

NO_x emissions shall not exceed 2.0 pounds per hour.

Applicable Compliance Method:

Compliance may be determined through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 100 pounds of NO_x emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot and multiply the resultant by the maximum burner capacity of 20 mmBtu per hour.

If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix. Alternative U.S. EPA-approved compliance methods may be used with prior approval from the Ohio EPA.

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

f. Emission Limitation:

NO_x emissions shall not exceed 8.8 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable NO_x emission limitation (2.0 pounds per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

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

g. Emission Limitation:

PE shall not exceed 0.09 pound per hour.

Applicable Compliance Method:

Compliance may be determined through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 1.9 pounds of PE emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot and multiply the resultant by the maximum burner capacity of 20 mmBtu per hour.

If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 5 of 40 CFR Part 60, Appendix A and the procedures in OAC rule 3745-

17-03(B)(9). Alternative U.S. EPA-approved compliance methods may be used with prior approval from the Ohio EPA.

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

h. Emission Limitation:

PE shall not exceed 0.4 ton per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable PE emission limitation (0.09 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

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

i. Emission Limitation:

SO_2 emissions shall not exceed 0.01 pound per hour.

Applicable Compliance Method:

Compliance may be determined through calculations based on emission factors specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 0.6 pound of SO_2 emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot and multiply the resultant by the maximum burner capacity of 20 mmBtu per hour.

If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 6 of 40 CFR Part 60, Appendix A and the procedures in OAC rule 3745-18-04(E). Alternative U.S. EPA-approved compliance methods may be used with prior approval from the Ohio EPA.

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

j. Emission Limitation:

SO_2 emissions shall not exceed 0.05 ton per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable SO_2 emission limitation (0.01 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

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

k. Emission Limitation:

The permanent total enclosure shall capture 100% of the VOC emitted by the coating applicator.

Applicable Compliance Method:

If required, the permittee shall perform additional emissions tests, conducted in accordance with USEPA Method 204 of 40 CFR Part 51, Appendix M and methods and procedures of OAC rule 3745-21-10(C). Alternative U.S. EPA-approved compliance methods may be used with prior approval from the Ohio EPA.

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

l. Emission Limitation:

The permittee shall maintain a minimum of 90% overall control efficiency for the VOC emissions from this emissions unit.

Applicable Compliance Method:

If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 25 of 40 CFR Part 60, Appendix A, USEPA Methods 204 of CFR Part 51, Appendix M and methods and procedures of 40 CFR 60.466 and OAC rule 3745-21-10(C). (94 weight percent based on June 9, 2005 stack testing) Alternative U.S. EPA-approved compliance methods may be used with prior approval from the Ohio EPA.

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

m. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance with the above visible limitation shall be demonstrated by visible PE evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)]

n. Emission Limitation:

98% overall control of organic HAP for each month during each 12-month compliance period

Applicable Compliance Method:

The monitoring and record keeping requirements of d)(7) (40 CFR 63.5170) shall serve as demonstration of compliance with this emission limitation.

If required, the permittee shall demonstrate compliance according to 40 CFR 63.5160(d) and 63.5160(e).

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart SSSS]

o. Emission Limitation:

0.046 kilogram of organic HAP per liter (0.38 lb/gal) of solids applied during each 12-month compliance period

Applicable Compliance Method:

The monitoring and record keeping requirements of d)(7) (40 CFR 63.5170) shall serve as demonstration of compliance with this emission limitation.

If required, the permittee shall demonstrate compliance with this emission limitation according to 40 CFR 63.5160.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CR Part 63 Subpart SSSS]

p. Emission Limitation:

100% capture efficiency and organic HAP emissions shall not exceed 20 parts per million by volume (ppmv) on a dry basis

Applicable Compliance Method:

The monitoring and record keeping requirements of d)(7) (40 CFR 63.5170) shall serve as demonstration of compliance with this emission limitation.

If required, the permittee shall demonstrate compliance according to 40 CFR 63.5160(d) and 63.5160(e).

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart SSSS]

q. Emission Limitation:

0.28 kilogram VOC per liter (kg VOC/l) of coating solids

Applicable Compliance Method:

If required, the procedures specified under 40 CFR 60.463(c) shall be used to demonstrate compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60 Subpart TT]

r. Emission Limitation:

0.14 kg VOC/l of coating solids

Applicable Compliance Method:

If required, the procedures specified under 40 CFR 60.463(c) shall be used to demonstrate compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60 Subpart TT]

s. Emission Limitation:

Emissions shall not exceed a value between 0.14 (or a 90-percent emission reduction) and 0.28 kg VOC/l of coating solids applied for each calendar month for each affected facility that intermittently uses an emission control device.

Applicable Compliance Method:

If required, the procedures specified under 40 CFR 60.463(c) shall be used to demonstrate compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60 Subpart TT]

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

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

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

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission limitation for VOC: Methods 1 through 4 and 25 of 40 CFR Part 60, Appendix A. The sampling time for each of three runs is to be at least 60 minutes, and the minimum sampling volume is to be at least 0.003 dscm (0.11 dscf); however, shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Ohio EPA. The test method(s) which must be employed to demonstrate compliance with the control efficiency limitations are specified below. Alternative U.S. EPA-approved test methods may be used with prior approval from the Toledo Division of Environmental Services.

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 Toledo Division of Environmental Services. 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. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Toledo Division of Environmental Services.

f. The permittee shall record the temperature immediately upstream and downstream of the incinerator's catalyst bed, and the pressure differential between the inside and outside of the permanent total enclosure at least once every 15 minutes during each test run. The permittee shall determine the 3-hour average temperature immediately upstream and the 3-hour average temperature immediately downstream of the catalyst bed, and the 3-hour average pressure differential between the inside and outside of the permanent total enclosure during each test run, and include the 3-hour average temperature and pressure differential values in the written test report.

g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. 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 Toledo Division of Environmental Service's refusal to accept the results of the emission test(s).

h. Personnel from the Toledo Division of Environmental Services 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.

i. 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 Toledo Division of Environmental Services 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 Toledo Division of Environmental Services.

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

g) Miscellaneous Requirements

(1) None.

2. K005, 36 inch coil coating line (North Coater)

Operations, Property and/or Equipment Description:

36 inch coil coating line with 12 mmBtu/hr direct-fired natural gas drying oven, permanent total enclosure, and 15 mmBtu/hr catalytic incinerator

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI P0120305 issued 2/10/2016)	Carbon monoxide (CO) emissions shall not exceed 2.22 pounds per hour and 9.7 tons per year.
		Nitrogen oxides (NO_x) emissions shall not exceed 2.65 pounds per hour and 11.6 tons per year.
		Particulate emissions (PE) shall not exceed 0.05 pound per hour and 0.22 ton per year.
		Sulfur dioxide (SO_2) emissions shall not exceed 0.02 pound per hour and 0.09 ton per year.
		Volatile organic compounds (VOC) emissions shall not exceed 14.02 pounds per hour and 61.5 tons per year.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
		See b)(2)a through b)(2)c.
b.	40 CFR Part 60, Subpart A	See b)(2)e.
c.	40 CFR Part 60, Subpart TT (40 CFR 60.460 – 466) [In accordance with 40 CFR 60.462(a), this emissions unit is a metal coil coating line subject to the emission limitations and control	See b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	measures specified in this section.]	
d.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-17-11(A)(2)	See b)(2)d.
f.	OAC rule 3745-18-06(A)	See b)(2)d.
g.	OAC rule 3745-21-09(E) and OAC rule 3745-21-09(B)(6)	See b)(2)d.
h.	40 CFR Part 63, Subpart A (40 CFR 63.1 – 16)	Table 2 of 40 CFR Part 63, Subpart SSSS provides cross-references, indicating which parts of the General Provisions apply.
i.	40 CFR Part 63, Subpart SSSS (40 CFR 63.5080 – 5201) [This metal coil coating line is subject to the emission standards in 63.5120.]	The permittee must limit organic HAP emissions to the level specified below: No more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction); or No more than 0.046 kilogram of organic HAP per liter of solids applied during each 12-month compliance period; or If an oxidizer is used to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume on a dry basis is achieved and the efficiency of the capture system is 100 percent.
j.	40 CFR Part 64 – Compliance Assurance Monitoring (CAM) (64.1 – 64.10) [In accordance with 40 CFR 64.2, this is a pollutant specific emissions unit located at a major source that is subject to a VOC emission limitation and has potential pre-control device emissions greater than 100 tons per year.]	See c)(1) – c)(3), d)(1) – d)(3), e(1) and e)(2).

(2) Additional Terms and Conditions

a. The permittee shall operate and maintain a permanent total enclosure and a catalytic incinerator to capture and control the VOC emissions.

b. The permittee shall not allow or permit the discharge into the atmosphere of more than 2 percent of the VOC applied for each calendar month (98 percent emission reduction).

c. The permanent total enclosure shall capture 100% of the VOC emitted by the coating applicator.

d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

e. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.

c) Operational Restrictions

(1) This emissions unit shall be totally enclosed such that all the VOC emissions are captured for venting to the catalytic incinerator. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:

a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;

b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four wall's, floor and ceiling;

c. the average face velocity (FV) of air through all the NDO's shall be at least 3,600 m/hr (200 fpm);

d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water as a 3-hour average;

e. the direction of air flow through all NDO's shall be into the enclosure;

f. all access doors and windows whose areas are not included in b. and are not included in the calculations in c)(1)c shall be closed during routine operation of the process; and

g. all VOC emissions from the coating line must be captured and contained for discharge to the catalytic incinerator.

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

(2) The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

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

(3) The permittee shall develop and implement an inspection and maintenance plan for the catalytic oxidizer serving this emissions unit. The plan must address, at a minimum, the following elements:

a. Annual sampling and analysis of the catalyst activity (i.e., conversion efficiency) following the manufacturer's or catalyst supplier's recommended procedures.

b. Monthly inspection of the oxidizer system including the burner assembly and fuel supply lines for problems; and,

c. Annual internal and monthly external visual inspection of the catalyst bed to check for channeling, abrasion, and settling. If problems are found, the permittee shall take corrective action consistent with the manufacturer's recommendations and conduct a new performance test to determine destruction efficiency according to 40 CFR 63.5160.

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

(4) The permittee shall only burn natural gas in this emissions unit.

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

(5) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart SSSS, including the following sections:

63.5121(a)	establishes capture and control device operating limits to be met at all times

[Authority for term: 40 CFR Part 63 Subpart SSSS and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record each day, all 3-hour blocks of time during which the permanent total enclosure was a not maintained at an average differential pressure of a least 0.007 inch of water column whenever the emissions unit was in operation.

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

(2) The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. These devices shall have an accuracy of plus or minus 2.5 degrees Celsius or plus or minus 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater, pursuant to the requirements specified in 40 CFR 60.464(c). The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

(3) 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 catalytic incinerator was/were in operation, during which the average temperature of the exhaust gases immediately before the catalyst bed was below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance;

[Note: This requirement requires reporting on a more stringent basis than that required under OAC rule 3745-21-09(B)(4)(b)(iii) since the permittee has requested to monitor on the same basis as that required under 40 CFR 63.5160(d)(3)((ii)(C).]

b. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; and

c. a log or record of the operating time for the capture (collection) system, catalytic incinerator, monitoring equipment, and the associated emissions unit(s).

The permittee may use a temperature chart recorder or equivalent recording device as the log that documents the temperature differential across the catalyst bed.

[Authority for term: OAC rule 3745-21-09(B)(4)(b), OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

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

a. the name and identification of each coating, as applied

b. the pounds of VOC per gallon of coating, as applied, and the volume, as applied, of each coating;

c. the total uncontrolled VOC emissions from all coatings, in pounds per day;

d. the name and identification of each cleanup material employed;

e. the number of gallons of each cleanup material employed;

f. the uncontrolled VOC content of each cleanup material, in pounds per gallon;

g. the total uncontrolled VOC emissions from all cleanup materials, in pounds per day;

h. the total number of hours the emissions unit was in operation;

i. the average hourly uncontrolled VOC emissions from all coatings and cleanup materials, i.e., (c + g)/h, in pounds per hour (average); and

j. the average hourly controlled VOC emissions from all coatings and cleanup materials, in pounds per hour, calculated using 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.

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

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

a. the calculated, controlled VOC emissions from all coatings and cleanup materials, in tons per month, calculated using d)(4)c., d)(4)g. 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; and

b. the rolling, 12 month summation of VOC emissions from all coatings and cleanup materials, in tons.

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

(6) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

(7) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart SSSS, including the following sections:

63.5150(a)(1)	Bypass monitoring for intermittently-controllable work stations
63.5150(a)(2)	Continuous emission monitoring system (CEMS) requirements if using a CEMS to demonstrate compliance
63.5150(a)(3)	Temperature monitoring of oxidizers
63.5150(a)(4)	Capture system monitoring
63.5160(d)(3)(ii)(D)	Catalytic oxidizer inspection and maintenance plan
63.5170(a)	If using as-purchased compliant coatings
63.5170(b)	If using as-applied compliant coatings
63.5170(c)	If using capture and control device to reduce emissions to no more than allowable limit
63.5170(d)	If using capture and control to achieve the emission rate limit
63.5170(e)	If using solvent recovery to demonstrate compliance
63.5170(f)	Use of oxidation to demonstrate compliance
63.5170(g)	If using a combination of capture and control
63.5190(a)(1)	Beginning and ending dates of each compliance option used
63.5190(a)(2)	Records of all measurements needed to demonstrate compliance
63.5190(a)(3)	Records specified in 63.10(b)(3)
63.5190(a)(4)	Records if using CEMS
63.5190(a)(5)	Records of liquid-liquid material balances

[Authority for term: 40 CFR Part 63 Subpart SSSS and OAC rule 3745-77-07(C)(1)]

(8) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart TT, including the following sections:

60.463(b)	Monthly performance test requirement
60.463(c)(2)	Determining overall reduction efficiency
60.464(c)	Catalytic incinerator temperature monitoring requirements
60.465(e)	Catalytic incinerator temperature recordkeeping requirements

[Authority for term: 40 CFR Part 60 Subpart TT and OAC rule 3745-77-07(C)(1)]

(9) The permittee received permission from U.S. EPA by letter dated March 8, 2010 to implement the compliance method described in 40 CFR 63.5160(d)(3) to demonstrate compliance with 40 CFR Part 60, Subpart TT. The permittee may only use this method for demonstrating compliance with 40 CFR Part 60, Subpart TT when performing skim coating at this emissions unit. At all other times, the permittee is required to demonstrate compliance with 40 CFR Part 60, Subpart TT using both the catalyst bed inlet temperature and temperature difference requirement.

The permittee is still required to record and report the temperature difference across the catalyst bed during skim coating operations to maintain compliance with the record keeping and reporting requirements of 40 CFR Part 60, Subpart TT. However, compliance during skim coating operations can be demonstrated using only the catalyst bed inlet temperature accompanied by the operation and maintenance plan and annual catalyst activity testing specified under 40 CFR 63.5160(d)(3)(ii)(D).

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

(10) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # P0120305, issued on February 10, 2016:d)(8) through d)(9). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

e) Reporting Requirements

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

a. each day during which the calculated, controlled VOC emission rate exceeded 14.02 pounds per hour, and the actual calculated, controlled VOC emission rate for each such day;

b. each month during which annual VOC emissions exceeded 61.5 tons per year as a rolling, 12-month summation of the monthly emissions;

c. all 3-hour blocks of time during which the permanent total enclosure was not maintained at an average differential pressure of at least 0.007 inch of water column when the emissions unit was in operation;

d. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was below the average temperature established during the most recent emission tests that demonstrated the emissions unit(s) was/were in compliance; and

e. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference established during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance.

f. The permittee shall submit the results of the monthly catalytic incinerator inspections required under c)(3) that are completed during the reporting period.

g. The permittee shall submit the results of the annual catalyst activity test(s) required by c)(3) in the last quarterly report for each year, along with a summary of the results of the annual inspection of the internal integrity of the catalytic incinerator required by c)(3).

If no deviations/excursions occurred during a calendar quarter, the report shall state that no deviations occurred during the reporting period.

[OAC rule 3745-15-03(B)(1)(b), OAC rule 3745-15-03(C), OAC rule 3745-21-09(B)(4)(c), OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(2) The permittee shall submit quarterly summaries of the following records:

a. any records of downtime (date and length of time) for the capture (collection) system, the catalytic incinerator, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and

b. a log of the operating time for the capture system, catalytic incinerator, monitoring equipment, and the emissions unit(s).

[Authority for term: OAC rule 3745-21-09(B)(4)(c), OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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

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

(5) The permittee shall submit semiannual reports and such other notifications and reports to the Toledo Division of Environmental Services and EPA Region 5 as are required pursuant to 40 CFR Part 63, Subpart SSSS, per the following sections:

63.5180(a)	Submit reports to EPA Region 5 and Toledo Division of Environmental Services
63.5180(c)	Notification of Performance Test
63.5180(e)	Performance Test Report
63.5180(f)	Start-up shutdown and malfunction reports
63.5180(g)	Semi-annual compliance reports
63.5180(h)	Deviation reports if not using a CEMS
63.5180(i)	Deviation reports if using a CEMS

[Authority for term: 40 CFR Part 63 Subpart SSSS and OAC rule 3745-77-07(C)(1)]

(6) The permittee shall submit semiannual reports and such other notifications and reports to the Toledo Division of Environmental Services as are required pursuant to 40 CFR Part 60, Subpart TT, per the following sections:

60.465(d)	semi-annual incinerator temperature deviation reports

[Authority for term: 40 CFR Part 60 Subpart TT and OAC rule 3745-77-07(C)(1)]

(7) 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 rule 3745-77-07(C)(1)]

(8) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #P0120305, issued on February 10, 2016: e)(6) through e)(7). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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

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

The permittee shall not allow or permit the discharge into the atmosphere of more than 2 percent of the VOC applied for each calendar month (98 percent emission reduction).

Applicable Compliance Method:

If required, the permittee shall perform additional emissions tests, conducted in accordance with USEPA Method 25 and Methods 204 through Method 204F of 40 CFR Part 60, Appendix A, and methods and procedures of OAC 3745-21-10(C) and 40 CFR Part 60.466.

For Method 25, the sampling time for each of three runs is to be at least 60 minutes, and the minimum sampling volume is to be at least 0.003 dry standard meter (DSCM); however, shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator.

Method 24 and the procedures of 40 CFR 60.466, or data provided by the formulator of the coating, shall be used for determining the VOC content of each coating as applied to the surface of the metal coil. In the event of a dispute, Reference Method 24 shall be the method. When VOC content of waterborne coatings, determined by Method 24, is used to determine compliance of affected facilities, the results of the Method 24 analysis shall be adjusted as described in section 12.6 of Method 24. For Method 24, the coating sample must be at least a 1-liter sample taken at a point where the sample will be representative of the coating as applied to the surface of the metal coil.

Alternative U.S. EPA-approved compliance methods may be used with prior approval from the Ohio EPA.

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

b. Emission limitation:

VOC emissions shall not exceed 14.02 pounds per hour.

Applicable Compliance Method:

If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 25 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved compliance methods may be used with prior approval from the Ohio EPA.

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

c. Emission limitation:

VOC emissions shall not exceed 61.5 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon a rolling, summation of monthly emissions calculated in d)(5).

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

d. Emission limitation:

CO emissions shall not exceed 2.22 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the maximum burner capacity of 27 mmBtu per hour, an emission factor of 84 pounds of CO per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This CO emissions factor is specified in Table 1.4-1 of USEPA reference document AP42, Fifth Edison, Compilation of Air Pollution Emission Factors, dated 7/98.

If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved compliance methods may be used with prior approval from the Ohio EPA.

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

e. Emission limitation:

CO emissions shall not exceed 9.7 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the short-term allowable CO emission limitation (2.22 pounds per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

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

f. Emission limitation:

NO_x emissions shall not exceed 2.65 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the maximum burner capacity of 27 mmBtu per hour, an emission factor of 100 pounds of NO_x per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This NO_x emission factor is specified in Table 1.4-1 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 7/98.

If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 7 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved compliance methods may be used with prior approval from the Ohio EPA.

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

g. Emission limitation:

NO_x emissions shall not exceed 11.6 tons per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the short-term allowable NO_x emission limitation (2.65 pounds per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

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

h. Emission limitation:

PE shall not exceed 0.05 pound per hour.

Applicable Compliance Method:

Compliance may be demonstrated based upon the maximum burner capacity of 27 mmBtu per hour, an emission factor of 1.9 pounds of particulates per million standard cubic feet and a heating value of 1020 Btu per standard cubic foot. This particulate emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 7/98.

If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 5 of 40 CFR Part 60, Appendix A and the procedures in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA-approved compliance methods may be used with prior approval from the Ohio EPA.

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

i. Emission limitation:

PE shall not exceed 0.22 ton per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the short-term allowable CO emission limitation (0.05 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

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

j. Emission limitation:

SO_2 emissions shall not exceed 0.02 pound per hour.

Applicable Compliance Method:

Compliance may be demonstrated based upon the maximum burner capacity of 27 mmBtu per hour, an emission factor of 0.6 pound of SO_2 per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This SO_2 emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 7/98.

If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 6 of 40 CFR Part 60, Appendix A and the procedures in OAC rule 3745-18-07(E). Alternative U.S. EPA-approved compliance methods may be used with prior approval from the Ohio EPA.

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

k. Emission limitation:

SO_2 emissions shall not exceed and 0.09 ton per year.

Applicable Compliance Method:

This emission limitation was developed by multiplying the short-term allowable SO_2 emission limitation (0.02 pound per hour) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

l. Emission limitation:

The permanent total enclosure shall capture 100% of the VOC emitted by the coating applicator.

Applicable Compliance Method:

Compliance shall be demonstrated by performing emission tests conducted in accordance with USEPA Method 204 of 40 CFR Part 51, Appendix M and the methods and procedures specified in OAC rule 3745-21-10(C).

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

m. Emission limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance with the above visible limitation shall be demonstrated by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

n. Emission limitation:

No more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction)

Applicable Compliance Method:

The monitoring and record keeping requirements of d)(7) (40 CFR 63.5170) shall serve as demonstration of compliance with this emission limitation.

If required, the permittee shall demonstrate compliance according to 40 CFR 63.5160(d) and 63.5160(e).

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

o. Emission limitation:

No more than 0.046 kilogram of organic HAP per liter of solids applied during each 12-month compliance period

Applicable Compliance Method:

The monitoring and record keeping requirements of d)(7) (40 CFR 63.5170) shall serve as demonstration of compliance with this emission limitation.

If required, the permittee shall demonstrate compliance with this emission limitation according to 40 CFR 63.5160.

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

p. Emission limitation:

If an oxidizer is used to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume on a dry basis is achieved and the efficiency of the capture system is 100 percent.

Applicable Compliance Method:

The monitoring and record keeping requirements of d)(7) (40 CFR 63.5170) shall serve as demonstration of compliance with this emission limitation.

If required, the permittee shall demonstrate compliance according to 40 CFR 63.5160(d) and 63.5160(e).

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

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

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

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

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission limitation for VOC: Methods 1 through 4 and 25 of 40 CFR Part 60, Appendix A. The sampling time for each of three runs is to be at least 60 minutes, and the minimum sampling volume is to be at least 0.003 dscm (0.11 dscf); however, shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Toledo Division of Environmental Services.

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 Toledo Division of Environmental Services. 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. The permittee shall record the temperature immediately upstream and downstream of the incinerator's catalyst bed, and the pressure differential between the inside and outside of the permanent total enclosure at least once every 15 minutes during each test run. The permittee shall determine the 3-hour average temperature immediately upstream and the 3-hour average temperature immediately downstream of the catalyst bed, and the 3-hour average pressure differential between the inside and outside of the permanent total enclosure during each test run, and include the 3-hour average temperature and pressure differential values in the written test report.

The permittee shall also include a copy of the incinerator temperature recorder chart in the stack test report.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. 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 Toledo Division of Environmental Service's refusal to accept the results of the emission test(s).

g. Personnel from the Toledo Division of Environmental Services 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 Toledo Division of Environmental Services 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 Toledo Division of Environmental Services.

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

g) Miscellaneous Requirements

(1) None.