



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

7/25/2016

Certified Mail

Mr. Michael Tordella
 METOKOTE CORP PLANT NO 9
 1340 Neubrecht Road
 Lima, OH 45801

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0247120821
 Permit Number: P0121223
 Permit Type: OAC Chapter 3745-31 Modification
 County: Lorain

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Chronicle Telegram. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall and Ohio EPA DAPC, Northeast District Office
 Permit Review/Development Section 2110 East Aurora Road
 Ohio EPA, DAPC Twinsburg, OH 44087
 50 West Town Street Suite 700
 PO Box 1049
 Columbus, Ohio 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
 Ohio EPA-NEDO; Canada

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

MetoKote is a miscellaneous metal parts processing facility. The facility is a FEPTIO to avoid a MACT by restricting the facility-wide emissions of HAPs to 9.9 TPY for a single HAP and 24.9 TPY for combined HAPs.

The purpose of this permit is to allow for the increase of VOC/HAP emissions from K014, an electrodeposition coating line for misc. metal parts, following the permanent shutdown of K015, another coating line. The facility has had to increase the amount of material being coated in K014 and has changed the coating materials used. These changes will result in an increase above the current permitted allowable for K014 of 5.26 TPY, which will likely occur soon. Because of this, the facility has requested that this permit be rushed.

K014 is an electrodeposition coating line for miscellaneous metal parts employing low-VOC PPG product CF699-484, occasionally combined with an additive to increase fluidity. This line employs a conveyor system to move parts through multiple zones including the following: water spray, spray cleaner, activator spray, zinc phosphate immersion, sealer spray, water immersion, DI water spray, e-coat immersion (7,000-gallon tank), permeate spray, permeate immersion, and a cure oven rated at 5.6 mmBtu/hr. There is no control equipment associated with this line.

3. Facility Emissions and Attainment Status:

MetoKote is located in Lorain County which is currently in non-attainment for ozone and PM_{2.5}.

The facility-wide permit allowable emissions following this permit action include:

Pollutant	TPY
VOCs	25.32
PE	2.62
Single HAP	9.9
HAPs Combined	24.9

4. Source Emissions:

Because coatings are subject to change, the facility can potentially exceed the major source threshold for HAPs. If this occurred, the facility would potentially be subject to the requirements of 40 CFR Part 63, Subpart M – Surface Coating of Misc. Metal Parts and Products as well as TV permitting requirements. The facility has therefore opted for a FEPTIO permit to maintain HAPs below 9.9 TPY for a single HAP and 24.9 TPY for combined HAPs.



5. Conclusion:

The federally enforceable restrictions cited in the facility-wide terms and conditions of this permit are sufficient for the facility to operate as a synthetic minor source.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOCs	15.6

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate OAC Chapter 3745-31 Modification
METOKOTE CORP PLANT NO 9

5477 EVERGREEN PKWY,, Sheffield, OH 44054

ID#:P0121223

Date of Action: 7/25/2016

Permit Desc:Chapter 31 Modification to increase the VOC emissions for K014, an electrodeposition coating line for miscellaneous metal parts, from 5.26 TPY to 15.6 TPY following the permanent shutdown of a similar unit at the facility..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Christine Barnie, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)963-1200



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
METOKOTE CORP PLANT NO 9**

Facility ID:	0247120821
Permit Number:	P0121223
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	7/25/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
METOKOTE CORP PLANT NO 9

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Draft Permit-to-Install and Operate

METOKOTE CORP PLANT NO 9

Permit Number: P0121223

Facility ID: 0247120821

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0247120821
Application Number(s): A0056420
Permit Number: P0121223
Permit Description: Chapter 31 Modification to increase the VOC emissions for K014, an electrodeposition coating line for miscellaneous metal parts, from 5.26 TPY to 15.6 TPY following the permanent shutdown of a similar unit at the facility.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 7/25/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

METOKOTE CORP PLANT NO 9
5477 EVERGREEN PKWY
Sheffield, OH 44054

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Permit-to-Install and Operate

METOKOTE CORP PLANT NO 9

Permit Number: P0121223

Facility ID: 0247120821

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0121223

Permit Description: Chapter 31 Modification to increase the VOC emissions for K014, an electrodeposition coating line for miscellaneous metal parts, from 5.26 TPY to 15.6 TPY following the permanent shutdown of a similar unit at the facility.

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

Emissions Unit ID:	K014
Company Equipment ID:	Monorail E-Coat Line #14
Superseded Permit Number:	P0085510
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
METOKOTE CORP PLANT NO 9
Permit Number: P0121223
Facility ID: 0247120821
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



Draft Permit-to-Install and Operate
METOKOTE CORP PLANT NO 9
Permit Number: P0121223
Facility ID: 0247120821
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The Ohio EPA has determined that this facility may be subject to the requirements of 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants (NESHAP): Area Source Standards for Plating and Polishing Operations. At this time, the Ohio EPA is not accepting the delegating authority to enforce NESHAP standards for area sources. The requirements of this rule, that are applicable to the area source for hazardous air pollutants (HAP) identified in this permit, shall be enforceable by U.S. EPA, Region 5. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the Ohio EPA Northeast District Office.
3. The emissions of HAP, as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 tons per year (TPY) for any individual HAP and 24.9 TPY for total combined HAP, based upon rolling, 12-month summations.
4. The permittee shall collect and record the following information each month for the entire facility:
 - a) the name and identification number of each coating and cleanup employed;
 - b) the individual HAP* content for each HAP of each coating and cleanup, in pounds of individual HAP per gallon, as applied;
 - c) the total combined HAPs content of each coating and cleanup, in pounds of total combined HAPs per gallon, as applied [the sum of all the individual HAP contents from B.4.b)];
 - d) the number of gallons of each coating and cleanup employed;
 - e) the total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons per month [for each HAP, the sum of B.4.b) times B.4.d) for each coating and cleanup material];
 - f) the total combined HAPs emissions from all coating materials and cleanup materials employed, in tons per month [the sum of B.4.c) times B.4.d)] for each coating and cleanup material;
 - g) the rolling, 12-month summation of the total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons; and

- h) the rolling, 12-month summation of the total combined HAPs emissions from all coating materials and cleanup materials employed, in tons.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA Northeast District Office. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

5. All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
6. The permittee shall submit quarterly deviation (excursion) reports that identify:
- a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:
 - (1) all exceedances of the rolling, 12-month emission limitation for each individual HAP; and
 - (2) all exceedances of the rolling, 12-month emission limitation for total combined HAPs;
 - b) the probable cause of each deviation (excursion);
 - c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d) the magnitude and duration of each deviation (excursion).

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

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

7. The permittee shall also submit annual reports that specify the individual HAP and total combined HAPs emissions from this emissions unit for the previous calendar year. The reports shall be submitted



by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for these emissions units in the annual Fee Emission Report.

8. The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
9. Compliance with the emission limitations in B.3 shall be determined in accordance with the following methods:

a) Emission Limitation:

Individual HAP emissions from this facility shall not exceed 9.9 TPY, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in B.4 for each individual HAP.

b) Emission Limitation:

Total combined HAPs emissions from this facility shall not exceed 24.9 TPY, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in B.4 for total combined HAPs.



Draft Permit-to-Install and Operate
METOKOTE CORP PLANT NO 9
Permit Number: P0121223
Facility ID: 0247120821
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. K014, Monorail E-Coat Line #14

Operations, Property and/or Equipment Description:

Electrodeposition coating of miscellaneous metal parts with a gas-fired bake oven (rated at 5.6 mmBtu/hr)

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

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

a. b)(1)e and d)(5)

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

a. b)(1)d

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) June 30, 2008	Volatile organic compound (VOC) emissions shall not exceed 1.3 tons per month, averaged over a 12-month rolling period from coating and cleanup materials combined.
b.	OAC rule 3745-21-09(U)(1)(i)	VOC emissions shall not exceed 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents. The requirements established pursuant to this rule shall terminate at such time the source becomes subject to and complies with OAC rule 3745-21-26, but no later than 10/15/2016. At such time that the source complies with OAC rule 3745-21-26, the following terms shall no longer be applicable: d)(2), e)(1) and f)(1)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-26(C)(1)	The requirements established pursuant to this rule shall become effective no later than 10/15/2016. See b)(2)a, b)(2)b, c)(1), c)(2), d)(3), d)(4), e)(2), e)(3) and f)(1)c.
d.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid MACT)	See B.2 through B.9.
e.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(5).

(2) Additional Terms and Conditions

- a. The permittee shall limit VOC emissions from all VOC-containing materials (i.e., coatings, thinners, and any other additives) used in this emissions unit to the following maximum VOC content limitations as a daily volume-weighted average (mass of VOC per volume of coating (excluding water and exempt compounds), as applied):

Coating Type	Air Dried, Pound VOC per Gallon Coating	Baked, Pound VOC per Gallon Coating
General One-Component	2.8	2.3
General Multi-Component	2.8	2.3
Camouflage	3.5	3.5
Electric-Insulating Varnish	3.5	3.5
Etching Filler	3.5	3.5
Extreme High-Gloss	3.5	3.0
Extreme Performance	3.5	3.0
Heat-Resistant	3.5	3.0
High-Performance Architectural	6.2	6.2
High Temperature	3.5	3.5
Metallic	3.5	3.5
Military Specification	2.8	2.3
Mold-Seal	3.5	3.5
Pan Backing	3.5	3.5
Prefabricated Architectural Multi-Component	3.5	2.3
Prefabricated Architectural One-Component	3.5	2.3
Pretreatment	3.5	3.5
Repair and Touch-Up	3.5	3.0
Silicone Release	3.5	3.5
Solar-Absorbent	3.5	3.0
Vacuum Metallizing	3.5	3.5



Coating Type	Air Dried, Pound VOC per Gallon Coating	Baked, Pound VOC per Gallon Coating
Drum, New, Exterior	2.8	2.8
Drum, New, Interior	3.5	3.5
Drum, Reconditioned, Exterior	3.5	3.5
Drum, Reconditioned, Interior	4.2	4.2

*If a coating does not meet a specific coating category definition, then it can be assumed to be a general use coating and the VOC limit for “general” coating or “other” coating shall apply.

- b. The averaging of VOC emissions over two or more coating lines in order to demonstrate compliance with an applicable emission limitation is prohibited.
- c) **Operational Restrictions**
 - (1) The permittee shall use one or more of the following coating application methods, in accordance with manufacturer’s specifications, to apply any coating containing a VOC to metal parts and products:
 - a. electrostatic equipment;
 - b. high volume, low pressure (HVLP) spray equipment;
 - c. flow coating;
 - d. roller coating;
 - e. dip coating, including electrodeposition;
 - f. airless spray;
 - g. air-assisted airless spray; or
 - h. other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.
 - (2) The permittee shall utilize work practices to minimize VOC emissions from mixing operations, storage tanks and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but are not limited to, the following:
 - a. store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers;
 - b. ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept close at all times except when depositing or removing these materials;

- c. minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials;
- d. convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one location to another in closed containers or pipes; and
- e. minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the amount, in gallons, of each coating and clean-up material employed;
 - c. the VOC content of each coating and clean-up material, in pounds per gallon, as applied;
 - d. the total VOC emissions from all coatings and clean-up materials employed, in pounds (summation of "b" x "c" for each coating and clean-up material); and
 - e. the average monthly VOC emissions over a 12-month period, i.e., the total VOC emissions for the present month plus the previous 11 months, in tons, divided by 12 months.

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

- (2) In accordance with OAC rule 3745-21-09(U), the permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating, as applied; and
 - b. the VOC content of each coating (excluding water and exempt solvents) in pounds per gallon, as applied.
- (3) In accordance with OAC rule 3745-21-26, 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 identification of the coating type (as referenced) in b)(2)a for each coating employed;

- c. the mass of VOC per volume (excluding water and exempt solvents) and the volume of each coating (excluding water and exempt solvents), as applied; and
 - d. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9) for $C_{VOC,2}$.
- (4) The permittee shall maintain all records made to determine compliance with OAC rule 3745-21-26 for five years from the date such record is created and shall be made available to the Ohio EPA Northeast District Office within ninety days of a request.
- (5) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 TPY. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified federally enforceable permit-to-install and operate (FEPTIO) prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 TPY may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) In accordance with OAC rule 3745-21-09(U), the permittee shall notify the Ohio EPA Northeast District Office in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days following the end of the calendar month.
- (2) In accordance with OAC rule 3745-21-26, the permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable emission limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 45 days after the exceedance occurs.
- (3) The permittee shall notify the Ohio EPA Northeast District Office in writing within thirty days following the completion of the first documented achievement of compliance with each of the requirements of OAC rule 3745-21-26. The compliance certification shall provide the following:
- a. a description of the requirements;
 - b. a description of the records that document continuing compliance;
 - c. the results of any records that document continuing compliance, including calculations; and
 - d. a statement by the owner or operator as to whether the subject coating line has complied with the requirements.

f) Testing Requirements

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

a. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 1.3 tons per month, averaged over a 12-month rolling period from coating and cleanup materials combined.

Applicable Compliance Method:

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

b. Emission Limitation:

VOC emissions shall not exceed 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

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

In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren, and Wood Counties shall demonstrate compliance with any applicable VOC content limitation specified in OAC rule 3745-21-09 using USEPA Method 24. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

USEPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

c. Emission Limitation:

The permittee shall not apply to metal parts and products any coating that contains VOCs in excess of the limit specified in b)(2)a.

Applicable Compliance Method:

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



Draft Permit-to-Install and Operate

METOKOTE CORP PLANT NO 9

Permit Number: P0121223

Facility ID: 0247120821

Effective Date: To be entered upon final issuance

Compliance with the VOC emission limitations specified in this rule are based upon a weighted average by volume of all coating materials employed in the coating line in any one day. The VOC contents and densities of the coating materials subject to this rule shall be determined in accordance with OAC rule 3745-21-10(B).

g) Miscellaneous Requirements

- (1) None.