



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

10/21/2016

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: Jay Plastics, Inc.  
Facility ID: 0370010058  
Permit Type: Minor Permit Modification  
Permit Number: P0121763

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](http://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,

A handwritten signature in black ink that reads "Michael E. Hopkins".

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

Cc: Ohio EPA DAPC, Northwest District Office





## **PROPOSED**

# **Division of Air Pollution Control Title V Permit for Jay Plastics, Inc.**

Facility ID:	0370010058
Permit Number:	P0121763
Permit Type:	Minor Permit Modification
Issued:	10/21/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
Jay Plastics, Inc.

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**Proposed Title V Permit**  
Jay Plastics, Inc.  
**Permit Number:** P0121763  
**Facility ID:** 0370010058

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

## Authorization

Facility ID: 0370010058  
Facility Description: Miscellaneous plastic parts coating operations.  
Application Number(s): A0057028  
Permit Number: P0121763  
Permit Description: Title V minor permit modification to incorporate PTI P0117728 for K002 and PTI P0117861 for P009; the removal of coating lines R003-R005, R016, R101, R103, R105, R108-R112, generator P005, and bake ovens P001, P101, and P102; and update emission units currently included in the federally enforceable restriction of VOCs and HAPs.  
Permit Type: Minor Permit Modification  
Issue Date: 10/21/2016  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0111429

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

Jay Plastics, Inc.  
150 East Longview Avenue  
Mansfield, OH 44903-4206

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

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



**Proposed Title V Permit**  
Jay Plastics, Inc.  
**Permit Number:** P0121763  
**Facility ID:** 0370010058  
**Effective Date:** To be entered upon final issuance

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

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

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

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

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

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

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

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

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

c) The permittee shall submit required reports in the following manner:

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

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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

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

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

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

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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

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

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

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

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

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

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

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

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

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

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

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

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

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

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

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

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

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

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

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

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

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

- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
  - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

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

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

## **8. Fees**

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

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

## **9. Marketable Permit Programs**

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

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

**10. Reasonably Anticipated Operating Scenarios**

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

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

**11. Reopening for Cause**

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

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

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

**12. Federal and State Enforceability**

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

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

**13. Compliance Requirements**

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - (2) Compliance certifications shall include the following:
    - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
    - b. The permittee's current compliance status.

- c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
  - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
  - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

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

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

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

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

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

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

## 16. Emergencies

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

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

## 17. Off-Permit Changes

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

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

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

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

## 18. Compliance Method Requirements

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

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

**19. Insignificant Activities or Emissions Levels**

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

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

**20. Permit to Install Requirement**

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

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

**21. Air Pollution Nuisance**

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

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

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

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

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

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

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

**23. Title VI Provisions**

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

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

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

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

The permittee shall submit required reports in the following manner:

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

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

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

**26. Inspections and Information Requests**

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



whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

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

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

**28. Permit Transfers**

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

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

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

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

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

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



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

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



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



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) B.3-B.6.
  
2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21, and/or 40 CFR Part 60 or 63:
  - a) P006 - Molten Salt Bath Rack Cleaner (Kolene No. 6) [PTI 03-16100 issued 4/20/04]  
  
[Authority for term: OAC rule 3745-77-07(A)(13)]
  
3. The permit to install for emission units R008 and R009 (PTI 03-17180 issued April 3, 2007) was evaluated based on the actual materials (adhesive) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
  - a) R008  
Pollutant: Xylene  
TLV: 100 ppm  
Maximum Hourly Emission Rate (lbs/hr): 0.29  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 128.40  
MAGLC (ug/m3): 10338.0
  
  - b) R009  
Pollutant: Toluene  
TLV: 50 ppm  
Maximum Hourly Emission Rate (lbs/hr): 1.19  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 659.50  
MAGLC (ug/m3): 8479.4
  
4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a) changes in the composition of the materials used (mold release agent), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value

(TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b) changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c) physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
6. The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a) a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
  - b) documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c) where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
7. The permittee is subject to the applicable emission limitations and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart ZZZZ, in accordance with 40 CFR Parts 63.6580 through 63.6675 (including the Table(s) and Appendix(ices) referenced in Subpart ZZZZ). The permittee shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ no later than 10/19/2013. The following emissions units in this permit are subject to the aforementioned requirements: P004, P008, and P009.
8. The permittee is subject to the applicable emission limitations and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 60, Subpart JJJJ, in accordance with 40 CFR Part 63.6590(c). The following emissions units in this permit are subject to the aforementioned requirements: P009.



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



**1. K001, Paint Line #3**

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

Plastic parts coating line consisting of primer booth, IR Flash oven, base coat booth, IR flash oven, thermal top coat booth, thermal cure oven, UV coating booth, IR flash oven, and UV cure oven and paint mixing room #3.

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

(1) b)(1)d. and d)(9).

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) (PTI #P0108820, issued 12/27/2011)	84.36 tons volatile organic compounds (VOC)/rolling 12-month period, from coating and cleaning operations
b.	OAC rule 3745-31-05 (D) (PTI #P0108820, issued 12/27/2011)	230.0 tons of VOC per rolling, 12-month period, from the coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined  9.90 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs for emissions units K001, K002, R006-R015, and R021, combined.  See b)(2)a.
c.	OAC rule 3745-17-11 (C)	See c)(2), c)(3), and d)(1) through d)(5)
d.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(9).

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for purposes of avoiding the applicability of Maximum Achievable Control



Technology (MACT) regulations and maintains the facility as a minor source for attainment New Source Review:

230.0 tons of VOC per rolling, 12-month period from the coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined [See c)(1)].

9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs for emissions units K001, K002, R006-R015, and R021, combined. Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

Federally enforceable VOC and HAP emission limitations were established in previously issued permits for emissions units K001, K002, R006-R015, and R021, and as such the facility has existing usage and VOC and HAP emissions records for the coating operations in lieu of establishing monthly restrictions for the first year of operation.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} \leq 230.0$$

where,

M = the increment of the rolling, 12-month period;

V<sub>i</sub> = VOC content in pounds per gallon of each coating/cleanup employed;

G<sub>i</sub> = Gallons used of each coating and cleanup material for the rolling, 12-month period

n = total number of unique coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021

[OAC rule 3745-77-07(A)(1) and PTI #P0108820]

- (2) The permittee shall install and operate a dry filtration system\* and water wash system\* for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter and water wash in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee

\*UV coating booth is equipped with dry filtration. Basecoat, Primer Coat, and Topcoat booths are equipped with water wash.

[OAC rule 3745-77-07(A)(1) and PTI #P0108820]

- (3) In the event the particulate filter system and/or water wash is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and PTI #P0108820]

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

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter and water wash control, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0108820]

- (2) The permittee shall conduct periodic inspections of the dry particulate filter and water wash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0108820]

- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter and water wash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and PTI #P0108820]

- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and water wash control system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and

- d. the name of person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and PTI #P0108820]

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter and/or water wash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter and/or water wash control was not operated according to the manufacturers recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0108820]

- (6) The permittee shall collect and record the following information each month for coating/cleanup material usage in the emissions unit:
- a. The name and identification number of each coating and cleanup material employed;
  - b. The number of gallons of each coating and cleanup material employed;
  - c. The VOC content of each coating and cleanup material employed, as applied, in lbs/gallon;
  - d. The VOC emissions from each coating and cleanup material employed, in lbs, [d)(6)b. x d)(6)c.];
  - e. The total VOC emissions from all coatings and cleanup materials employed, in tons, [sum of d)(6)d. x 1 ton/2000 lbs]; and
  - f. The total annual VOC emissions, in tons, from all coatings and cleanup materials employed, based upon a rolling, 12-month summation [the sum of d)(6)e. per rolling, 12-month period].

[OAC rule 3745-77-07(C)(1) and PTI #P0108820]

- (7) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined:
- a. the name and identification number of each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material employed, in pounds per gallon, as applied;



- c. the volume, in gallons, of each coating and cleanup material employed;
- d. the VOC emission rate for each coating and cleanup material employed [d)(7)b. x d)(7)c.], in pounds.
- e. the cumulative monthly VOC emission rate for all coatings and cleanup materials employed (summation of d)(7)d. x 1 ton/2000 lbs), in tons; and
- f. the rolling, 12-month VOC emissions, for all coatings and cleanup materials, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #P0108820]

- (8) The permittee shall collect and record the following HAP information each month for emissions K001, K002, R006-R015, and R021, combined:
- a. the name and identification number of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(8)b. x d)(8)c.] for each individual HAP, in lbs;
  - e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d)(8)d. for all coatings and cleanup materials), in lbs;
  - f. the total HAP emission rate for all HAPs, combined from all the coatings and cleanup materials employed (summation of d)(8)e. x 1 ton/2000 lbs for all HAPs for all coatings and cleanup materials), in tons; and
  - g. the rolling, 12-month emissions of each individual HAP and all HAPs, combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #P0108820]

- (9) Modeling to demonstrate compliance with, the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b) and OAC rule 3745-114-01, 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 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified Permit to Install (PTI), 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 ton per year may require the permittee to apply for and obtain a new PTI.

[PTI #P0108820]



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the 84.36 tons VOC/rolling, 12-month period from coating and cleaning operations.
  - b. all exceedances of the rolling, 12-month emission limitation of 230.0 tons for emissions units K001, K002, R006-R015, and R021, combined.
  - c. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively for emissions units K001, K002, R006-R015, and R021, combined.
  - d. any daily record showing that the dry particulate filter system and/or water wash control was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emission unit was in operation.

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

[OAC rule 3745-77-07(C)(1) and PTI #P0108820]

- (2) 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.

[OAC rule 3745-77-07(C)(1) and PTI #P0108820]

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:  
84.36 tons VOC/rolling, 12-month period from coating and cleaning operations

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements in section d)(6) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0108820]

- b. Emission Limitation:  
230.0 tons of VOC per rolling, 12-month period from the coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined



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Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in section d)(7) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0108820]

c. Emission Limitation:

9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs for emissions units K001, K002, R006-R015, and R021, combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in section d)(8) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0108820]

g) **Miscellaneous Requirements**

(1) None.



**2. K002, Paint Line #1**

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

Three paint booths, paint mixing room #1, water curtain and NG fired oven.

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

(1) b)(1)d., d)(9) through d)(12) and e)(3).

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) (PTI #P0117728, issued 11/3/2014)	15.5 tons volatile organic compounds (VOC) per month averaged over a 12-month rolling period from primer, base coat and clear coat booths combined
b.	OAC rule 3745-31-05(D) (PTI #P0117728, issued 11/3/2014)	42.4 lbs VOC/hr from primer, base coat and clear coat booths combined;  230.0 tons of VOC per rolling, 12-month period from the coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined;  9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emissions units K001, K002, R006-R015, and R021, combined]  See b)(2)a.
c.	OAC rule 3745-17-11(C)	See c)(2), c)(3) and d)(4) through d)(8)
d.	OAC rule 3745-114 ORC 3704.03(F)	See d)(9) through d)(12) and e)(3)
e.	OAC rule 3745-21-07(M)	See b)(2)b.



(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for purposes of avoiding the applicability of Maximum Achievable Control Technology (MACT) regulations and maintains the facility as a minor source for attainment New Source Review:

230.0 tons of VOC per rolling, 12-month period from the coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined [See c)(1)].

9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs for emissions units K001, K002, R006-R015, and R021 combined. Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

- b. This emissions unit is not subject to this rule because it does not meet all of the conditions outlined in OAC rule 3745-21-07(M)(3)(a).

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} \leq 230.0$$

where,

M = the increment of the rolling 12-month period;

Vi = VOC content in pounds per gallon of each coating/cleanup employed;

Gi = Gallons used of each coating and cleanup material for the rolling 12-month period

n = total number of unique coatings and cleanup materials employed in emission units K001, K002, R006-R015, and R021.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

- (2) The permittee shall operate the waterwash system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the waterwash in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

- (3) In the event the waterwash control system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

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

- (1) The permittee shall maintain monthly records of the VOC emissions from the primer, base coat and clear coat booths combined and at the end of 12 months of operation, the rolling 12-month summation of VOC emissions and the average calculated over each rolling 12-month period.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

- (2) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined:

- a. the name and identification number of each coating and cleanup material employed;
- b. the VOC content of each coating and cleanup material employed, in pounds per gallon, as applied;
- c. the volume, in gallons, of each coating and cleanup material employed;
- d. the VOC emission rate for each coating and cleanup material employed [d)(2)b. x d)(2)c.], in pounds; and
- e. the rolling, 12-month VOC emissions, for all coatings and cleanup materials, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

- (3) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, R006-R015, and R021, combined:

- a. the name and identification number of each coating and cleanup material employed;
- b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
- c. the number of gallons of each coating and cleanup material employed;



- d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(3)b. x d)(3)c.] for each individual HAP, in lbs;
- e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed [for each individual HAP, the summation of d)(3)d. for all coatings and cleanup materials], in lbs; and
- f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed [summation of d)(3)e. for all HAPs for all coatings and cleanup materials], in lbs.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

- (5) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

- (6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

- (7) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be

made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

- (8) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

- (9) The permit-to-install (PTI) application for this/these emissions unit(s), K002, was evaluated based on the actual materials and the design parameters of the emissions unit's(s) exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days



per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: Toluene  
TLV (mg/m3): 20 ppm  
Maximum Hourly Emission Rate (lbs/hr): 2.17  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 63.86  
MAGLC (ug/m3): 1738

Toxic Contaminant: Xylene  
TLV (mg/m3): 100 ppm  
Maximum Hourly Emission Rate (lbs/hr): 1.30  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 38.26  
MAGLC (ug/m3): 10,045

Toxic Contaminant: Ethyl Benzene  
TLV (mg/m3): 20 ppm  
Maximum Hourly Emission Rate (lbs/hr): 0.43  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12.66  
MAGLC (ug/m3): 2067

Toxic Contaminant: Glycol Ether  
TLV (mg/m3): 20 ppm  
Maximum Hourly Emission Rate (lbs/hr): 1.27  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 37.37  
MAGLC (ug/m3): 2309

The permittee, has demonstrated that emissions of toluene, xylene, ethyl benzene and glycol ether, from emissions unit(s) K002, are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

- (10) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

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

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

- (11) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and



- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

- (12) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the 15.5 tons VOC per month averaged over a 12-month rolling period from primer, base coat and clear coat booths combined;
  - b. all exceedances of the rolling, 12-month quantity of coatings and cleanup materials employed as specified in c)(1) (for emissions units K001, K002, R006-R015, and R021, combined);
  - c. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K001, K002, R006-R015, and R021, combined); and
  - d. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

These reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

- (2) 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.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

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



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

If no changes to the emissions, emissions unit(s), or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

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:

15.5 tons volatile organic compounds (VOC) per month averaged over a 12-month rolling period from primer, base coat and clear coat booths combined

Applicable Compliance Method:

Compliance with the ton(s) per month averaged over a 12-month rolling period shall be based upon the recordkeeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

- b. Emission Limitation:

42.4 lbs VOC/hr, from coatings operations

Applicable Compliance Method:

The hourly VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rates from the primer, base coat and clear coat booths by the maximum VOC content of the coatings used in each booth as follows:

Primer booth: (1.0 gal/hr) (6.1 lbs VOC/gal) = 6.1 lbs VOC/hr

Base coat booth: (3.17 gal/hr) (6.1 lbs VOC/gal) = 19.34 lbs VOC/hr



Clear coat booth: (3.17 gal/hr) (5.35 lbs VOC/gal) = 16.96 lbs VOC/hr

6.1 lbs VOC/hr + 19.34 lbs VOC/hr + 16.96 lbs VOC/hr = 42.5 lbs VOC/hr

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

c. Emission Limitation:

230.0 tons of OC per rolling, 12-month period, from coating and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in d)(2) of this permit.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

d. Emission Limitation:

9.90 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emission units K001, K002, R006-R015, and R021, combined]

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in d)(3) of this permit.

[OAC rule 3745-77-07(A)(1) and PTI #P0117728]

g) Miscellaneous Requirements

- (1) None.

**3. P004, Generator #1**

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

Generator #1 - 10.98 MMBtu/hr (1391 HP), natural gas-fired, 4SRB, spark-ignited RICE for use as a generated power supply (peak shaving).

- 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(D) (PTI # P0115083, issued 09/26/2013)	<p>Particulate matter less than or equal to ten microns in diameter (PM10) shall not exceed 0.10 lb/hr and 0.065 ton per rolling, 12-month period.</p> <p>Volatile organic compound (VOC) emissions shall not exceed 0.92 lb/hr and 0.57 ton per rolling, 12-month period</p> <p>Nitrogen oxide (NOx) emissions shall not exceed 39.92 lbs/hr and 24.95 tons per rolling, 12-month period</p> <p>Carbon monoxide (CO) emissions shall not exceed 27.54 lbs/hr and 17.21 tons per rolling, 12-month period.</p> <p>Sulfur dioxide (SO2) emissions shall not exceed 0.01 lb/hr and 0.004 ton per rolling, 12-month period.</p> <p>See b)(2)a. and c)(1)</p>
b.	OAC rule 3745-31-05(A)(3)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as six-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(5)(b)	See b)(2)c.
e.	OAC rule 3745-18-06	See b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	40 CFR, Part 63, Subpart ZZZZ (40 CFR 63.6580 to 63.6675)	The existing, natural gas, stationary 4SRB spark ignition (SI) reciprocating internal combustion engine (RICE), located at an area source for hazardous air pollutants (HAPs), shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ no later than October 19, 2013.
g.	40 CFR, Part 63, Subpart A	Per § 63.6665, Table 8 to 40 CFR Part 63, Subpart ZZZZ shows which parts of the General Provisions in §63.1 through 63.15 are applicable to Subpart ZZZZ.
h.	40 CFR, Part 60, Subpart JJJJ	This emissions unit is exempt from the requirements of this rule because it was manufactured before July 1, 2007.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE). The federally enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(D) and are based on the operational restrictions contained in c)(1):
  - i. 0.10 lbs PM10/hr; 0.065 tons PM10 per rolling, 12-month period;
  - ii. 0.92 lb VOC/hr; 0.57 tons VOC per rolling, 12-month period;
  - iii. 39.92 lbs NOx/hr; 24.95 tons NOx per rolling, 12-month period;
  - iv. 27.54 lbs CO/hr; 17.21 tons CO per rolling, 12-month period;
  - v. 0.01 lb SO2/hr; 0.004 tons SO2 per rolling, 12-month period.
- b. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with OAC rule 3745-31-05(D), OAC rule 3745-17-07(A) and 40 CFR, Part 63, Subpart ZZZZ.
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
- d. The emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(A).
- e. The permittee shall comply with the following applicable requirements identified in 40 CFR, Part 63, Subpart ZZZZ:
  - i. Per § 63.6635(b), except for monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as

applicable, calibration checks and required zero and span adjustments), you must monitor continuously at all times that the stationary RICE is operating.

- ii. Per § 63.6635(c), the permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. You must, however, use all the valid data collected during all other periods.
- iii. Per § 63.6640(a), the permittee must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart.
- iv. Per § 63.6640(b), the permittee must report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE.
- v. Per § 63.6640(e), the permittee must also report each instance in which you did not meet the requirements in Table 8 to this subpart that apply to you.
- vi. Per § 63.6603(a), if you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to this subpart and the operating limitations in Table 2b to this subpart that apply to you. Table 2d requires an NSCR to reduce HAP emissions from the stationary RICE.
- vii. Per § 63.6630(a), the permittee must demonstrate initial compliance with the emission limitations, operating limitations, and other requirements that apply to you according to Table 5 of this subpart. Table 5 states that if complying with the requirement to install an NSCR, compliance can be demonstrated through the following:
  - (a) Conducting an initial compliance demonstration as specified in 63.6630(e) to show that the average reduction of emissions of CO is 75 percent or more, the average CO concentration is less than or equal to 270 ppmvd at 15 percent O<sub>2</sub>, or the average reduction of emissions of THC is 30 percent or more;



- b. Per § 63.6625(h), if you operate a new, reconstructed, or existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.

[OAC rule 3745-77-07(A)(1), 40 CFR Part 63 Subpart ZZZZ and PTI #P0115083]

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

[OAC rule 3745-77-07(A)(1) and PTI #P0115083]

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

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

- a. The operating hours for each month; and
- b. The rolling, monthly summation of the operating hours.

[OAC rule 3745-77-07(C)(1) and PTI #P0115083]

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

[OAC rule 3745-77-07(C)(1) and PTI #P0115083]

- (3) The permittee shall comply with the following applicable requirements identified in 40 CFR, Part 63, Subpart ZZZZ:

- a. Per §63.6655(a), if you must comply with the emission and operating limitations, you must keep the records described in the following:
  - i. A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv).
  - ii. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
  - iii. Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii).
  - iv. Records of all required maintenance performed on the air pollution control and monitoring equipment.
  - v. Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to

restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

- b. Per §63.6655(b), for each CEMS or CPMS, you must keep the following records:
  - i. Records described in §63.10(b)(2)(vi) through (xi).
  - ii. Previous (i.e., superseded) versions of the performance evaluation plan as required in §63.8(d)(3).
  - iii. Requests for alternatives to the relative accuracy test for CEMS or CPMS as required in §63.8(f)(6)(i), if applicable.
- c. Per §63.6655(d), you must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to you.
- d. Per § 63.6625(a), if you elect to install a CEMS as specified in Table 5 of this subpart, you must install, operate, and maintain a CEMS to monitor CO and either oxygen or CO<sub>2</sub> at both the inlet and the outlet of the control device according to the following requirements:
  - i. Each CEMS must be installed, operated, and maintained according to the applicable performance specifications of 40 CFR part 60, appendix B.
  - ii. You must conduct an initial performance evaluation and an annual relative accuracy test audit (RATA) of each CEMS according to the requirements in §63.8 and according to the applicable performance specifications of 40 CFR part 60, appendix B as well as daily and periodic data quality checks in accordance with 40 CFR part 60, appendix F, procedure 1.
  - iii. As specified in §63.8(c)(4)(ii), each CEMS must complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. You must have at least two data points, with each representing a different 15-minute period, to have a valid hour of data.
  - iv. The CEMS data must be reduced as specified in §63.8(g)(2) and recorded in parts per million or parts per billion (as appropriate for the applicable limitation) at 15 percent oxygen or the equivalent CO<sub>2</sub> concentration.
- e. Per § 63.6625(b), if you are required to install a continuous parameter monitoring system (CPMS) as specified in Table 5 of this subpart, you must install, operate, and maintain each CPMS according to the requirements in the following paragraphs:

- i. The CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. You must have a minimum of four successive cycles of operation to have a valid hour of data.
- ii. Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), you must conduct all monitoring in continuous operation at all times that the unit is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
- iii. For purposes of calculating data averages, you must not use data recorded during monitoring malfunctions, associated repairs, out of control periods, or required quality assurance or control activities. You must use all the data collected during all other periods in assessing compliance. Any 15-minute period for which the monitoring system is out-of-control and data are not available for the required calculations constitutes a deviation from the monitoring requirements.
- iv. Determine the 3-hour block average of all recorded readings, except as provided in paragraph d)(6)c. above.
- v. Record the results of each inspection, calibration, and validation check.
- vi. You must develop a site-specific monitoring plan that addresses the following:
  - (a) Installation of the CPMS sampling probe or other interface at the appropriate location to obtain representative measurements;
  - (b) Performance and equipment specifications for the sample interface, parametric signal analyzer, and the data collection and reduction systems;
  - (c) Performance evaluation procedures and acceptance criteria (e.g., calibrations);
  - (d) Ongoing operation and maintenance procedures in accordance with the general requirements of §63.8(c)(1), (c)(3), and (c)(4)(ii);
  - (e) Ongoing data quality assurance procedures in accordance with the general requirements of §63.8(d); and
  - (f) Ongoing recordkeeping and reporting procedures in accordance with the general requirements of §63.10(c), (e)(1), and (e)(2)(i).
- vii. You must conduct a performance evaluation of each CPMS in accordance with your site-specific monitoring plan.

- viii. You must operate and maintain the CPMS in continuous operation according to the site-specific monitoring plan.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart ZZZZ and PTI #P0115083]

e) Reporting Requirements

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

- a. All exceedances of the rolling, 12-month limitation on the hours of operation for this emissions unit.

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

[OAC rule 3745-77-07(C)(1) and PTI #P0115083]

- (2) 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 to the Director (the appropriate Ohio EPA District Office) within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #P0115083]

- (3) The permittee shall comply with the following applicable requirements identified in 40 CFR, Part 63, Subpart ZZZZ:

- a. Per 63.6645(a), the permittee must submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) (see General Provisions below) that apply to you by the dates specified.

- b. Per 63.6645(g), if you are required to conduct a performance test, you must submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in §63.7(b)(1).

- c. Per 63.6645(h), if you are required to conduct a performance test or other initial compliance demonstration as specified in Tables 4 and 5 to this subpart, you must submit a Notification of Compliance Status according to §63.9(h)(2)(ii).

- i. Per 63.6645(h)(1), for each initial compliance demonstration required in Table 5 to this subpart that does not include a performance test, you must submit the Notification of Compliance Status before the close of business on the 30th day following the completion of the initial compliance demonstration.

- ii. Per 63.6645(h)(2), for each initial compliance demonstration required in Table 5 to this subpart that includes a performance test conducted according to the requirements in Table 3 to this subpart, you must submit the Notification of Compliance Status, including the performance test

results, before the close of business on the 60th day following the completion of the performance test according to §63.10(d)(2).

- d. Per §63.6650(a), you must submit each report in Table 7 of this subpart that applies to you.
- e. Per §63.6650(b), unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date in Table 7 of this subpart and according to the following requirements:
  - i. For semiannual Compliance reports, the first Compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.6595 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in §63.6595.
  - ii. For semiannual Compliance reports, the first Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in §63.6595.
  - iii. For semiannual Compliance reports, each subsequent Compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
  - iv. For semiannual Compliance reports, each subsequent Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
  - v. For each stationary RICE that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6 (a)(3)(iii)(A), you may submit the first and subsequent Compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (b)(4) of this section.
  - vi. For annual Compliance reports, the first Compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.6595 and ending on December 31.
  - vii. For annual Compliance reports, the first Compliance report must be postmarked or delivered no later than January 31 following the end of the first calendar year after the compliance date that is specified for your affected source in §63.6595.

- viii. For annual Compliance reports, each subsequent Compliance report must cover the annual reporting period from January 1 through December 31.
- ix. For annual Compliance reports, each subsequent Compliance report must be postmarked or delivered no later than January 31.
- f. Per §63.6650(c), the Compliance report must contain the following information:
  - i. Company name and address.
  - ii. Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
  - iii. Date of report and beginning and ending dates of the reporting period.
  - iv. If you had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction.
  - v. If there are no deviations from any emission or operating limitations that apply to you, a statement that there were no deviations from the emission or operating limitations during the reporting period.
  - vi. If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control, as specified in §63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.
- g. Per §63.6650(d), for each deviation from an emission or operating limitation that occurs for a stationary RICE where you are not using a CMS to comply with the emission or operating limitations in this subpart, the Compliance report must contain the information in e)(2)f.i. through e)(2)f.iv. (above) and the following information:
  - i. The total operating time of the stationary RICE at which the deviation occurred during the reporting period.
  - ii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- h. Per §63.6650(e), for each deviation from an emission or operating limitation occurring for a stationary RICE where you are using a CMS to comply with the

emission and operating limitations in this subpart, you must include information in e)(2)f.i. through e)(2)f.iv. (above) and the following information:

- i. The date and time that each malfunction started and stopped.
  - ii. The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks.
  - iii. The date, time, and duration that each CMS was out-of-control, including the information in §63.8(c)(8).
  - iv. The date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period.
  - v. A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period.
  - vi. A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes.
  - vii. A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the stationary RICE at which the CMS downtime occurred during that reporting period.
  - viii. An identification of each parameter and pollutant (CO or formaldehyde) that was monitored at the stationary RICE.
  - ix. A brief description of the stationary RICE.
  - x. A brief description of the CMS.
  - xi. The date of the latest CMS certification or audit.
  - xii. A description of any changes in CMS, processes, or controls since the last reporting period.
- i. Per §63.6650(f), each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of this subpart along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in this subpart, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the

affected source may have to report deviations from permit requirements to the permit authority.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart ZZZZ and PTI #P0115083]

- (4) 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.

[OAC rule 3745-15-03(A)]

f) Testing Requirements

- (1) The permittee shall comply with the following applicable requirements identified in 40 CFR, Part 63, Subpart ZZZZ:
- a. The emission testing shall be conducted to fulfill the initial performance requirements of 63.6595(a)(1) and 63.6612(a). The testing time frame specified may be amended or waived for cause upon prior request of, and written approval of, the appropriate Ohio EPA District Office or local air agency. Future testing requirements shall be conducted in accordance with 40 CFR Part 63, Subpart ZZZZ [§63.7(a)(2)].
  - b. Per 63.6612(a), the permittee must conduct any initial performance test or other initial compliance demonstration according to Tables 4 and 5 to this subpart that apply to you within 180 days after the compliance date that is specified for your stationary RICE in 63.6595 and according to the provisions in 63.7(a)(2).
  - c. An owner or operator is not required to conduct an initial performance test on a unit for which a performance test has been previously conducted, but the test must meet all of the following conditions:
    - i. The test must have been conducted using the same methods specified in this subpart, and these methods must have been followed correctly.
    - ii. The test must not be older than 2 years.
    - iii. The test must be reviewed and accepted by the Administrator.
    - iv. Either no process or equipment changes must have been made since the test was performed, or the owner or operator must be able to demonstrate that the results of the performance test, with or without adjustments, reliably demonstrate compliance despite process or equipment changes.
  - d. Per §63.6620(a), you must conduct each performance test in Tables 3 and 4 of this subpart that applies to you.
  - e. Per §63.6620(b), each performance test must be conducted according to the requirements that this subpart specifies in Table 4 to this subpart. If you own or operate a non-operational stationary RICE that is subject to performance testing,

you do not need to start up the engine solely to conduct the performance test. Owners and operators of a non-operational engine can conduct the performance test when the engine is started up again.

- f. Per §63.6620(f), if you comply with the emission limitation to reduce CO and you are not using an oxidation catalyst, if you comply with the emission limitation to reduce formaldehyde and you are not using NSCR, or if you comply with the emission limitation to limit the concentration of formaldehyde in the stationary RICE exhaust and you are not using an oxidation catalyst or NSCR, you must petition the Administrator for operating limitations to be established during the initial performance test and continuously monitored thereafter; or for approval of no operating limitations. You must not conduct the initial performance test until after the petition has been approved by the Administrator.
- g. Per §63.6620(g), if you petition the Administrator for approval of operating limitations, your petition must include the following information:
  - i. Identification of the specific parameters you propose to use as operating limitations;
  - ii. A discussion of the relationship between these parameters and HAP emissions, identifying how HAP emissions change with changes in these parameters, and how limitations on these parameters will serve to limit HAP emissions;
  - iii. A discussion of how you will establish the upper and/or lower values for these parameters which will establish the limits on these parameters in the operating limitations;
  - iv. A discussion identifying the methods you will use to measure and the instruments you will use to monitor these parameters, as well as the relative accuracy and precision of these methods and instruments; and
  - v. A discussion identifying the frequency and methods for recalibrating the instruments you will use for monitoring these parameters.
- h. Per §63.6620(h), if you petition the Administrator for approval of no operating limitations, your petition must include the information described in paragraphs (h)(1) through (7) of this section.
  - i. Identification of the parameters associated with operation of the stationary RICE and any emission control device which could change intentionally (e.g., operator adjustment, automatic controller adjustment, etc.) or unintentionally (e.g., wear and tear, error, etc.) on a routine basis or over time;
  - ii. A discussion of the relationship, if any, between changes in the parameters and changes in HAP emissions;

- iii. For the parameters which could change in such a way as to increase HAP emissions, a discussion of whether establishing limitations on the parameters would serve to limit HAP emissions;
  - iv. For the parameters which could change in such a way as to increase HAP emissions, a discussion of how you could establish upper and/or lower values for the parameters which would establish limits on the parameters in operating limitations;
  - v. For the parameters, a discussion identifying the methods you could use to measure them and the instruments you could use to monitor them, as well as the relative accuracy and precision of the methods and instruments;
  - vi. For the parameters, a discussion identifying the frequency and methods for recalibrating the instruments you could use to monitor them; and
  - vii. A discussion of why, from your point of view, it is infeasible or unreasonable to adopt the parameters as operating limitations.
- i. Per §63.6620(i), the engine percent load during a performance test must be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load in a specific application. A written report of the average percent load determination must be included in the notification of compliance status. The following information must be included in the written report: the engine model number, the engine manufacturer, the year of purchase, the manufacturer's site-rated brake horsepower, the ambient temperature, pressure, and humidity during the performance test, and all assumptions that were made to estimate or calculate percent load during the performance test must be clearly explained. If measurement devices such as flow meters, kilowatt meters, beta analyzers, stain gauges, etc. are used, the model number of the measurement device, and an estimate of its accurate in percentage of true value must be provided.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 63, Subpart ZZZZ and PTI #P0115083]

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

a. Emission Limitation:

PM<sub>10</sub> emissions shall not exceed 0.10 lb/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying an emission factor of  $9.50 \times 10^{-3}$  lb PM<sub>10</sub>/mmBtu (AP-42, Table 3.2-2) by a maximum capacity of 10.98 mmBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR, Part 60; Appendix A and



Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

[OAC rule 3745-77-07(C)(1) and PTI #P0115083]

b. Emission Limitation:

VOC emissions shall not exceed 0.92 lbs/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying a manufacturer's supplied emission factor of  $6.61 \text{ lb} \times 10^{-4} \text{ lbs VOC/hp-hr}$  by a maximum horsepower rating of 1,391 horsepower. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0115083]

c. Emission Limitation:

NO<sub>x</sub> emissions shall not exceed 39.92 lbs/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying a manufacturer's supplied emission factor of  $2.87 \times 10^{-2} \text{ lbs NO}_x\text{/hp-hr}$  by a maximum horsepower rating of 1,391 horsepower. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0115083]

d. Emission Limitation:

CO emissions shall not exceed 27.54 lbs/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying a manufacturer's supplied emission factor of  $1.98 \times 10^{-2} \text{ lbs CO/hp-hr}$  by a maximum horsepower rating of 1,391 horsepower. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0115083]



e. Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 0.005 lbs/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying an emission factor of  $5.88 \times 10^{-4}$  lb SO<sub>2</sub>/mmBtu (AP-42, Table 3.2-2) by a maximum capacity of 9.08 mmBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0115083]

f. Emission Limitations:

- i. 0.065 ton PM10 per rolling, 12-month period;
- ii. 0.57 ton VOC per rolling, 12-month period;
- iii. 24.95 tons NOx per rolling, 12-month period;
- iv. 17.21 tons CO per rolling, 12-month period; and
- v. 0.004 ton SO<sub>2</sub> per rolling, 12-month period.

Applicable Compliance Method

The above emission limitations were established based on 1,250 hours of operation per 12-month period and can be calculated, as follows:

For pollutants with emission factors specified in grams/bhp-hour:

gram pollutant <sup>(1)</sup>	1391 bhp-hr <sup>(2)</sup>	1250 hours <sup>(3)</sup>	1 pound <sup>(4)</sup>	1 ton <sup>(4)</sup>
bhp-hr		12-months	453.59 gram	2000 pounds

Where:

- <sup>(1)</sup> Pollutant-specific emission factor, as supplied by permittee.
- <sup>(2)</sup> Maximum capacity of the generator.
- <sup>(3)</sup> Restricted hours of operation.
- <sup>(4)</sup> Conversion rates.

For pollutants with emission factors specified in pounds/mmBtu:

pound pollutant <sup>(1)</sup>	10.98 mmBtu <sup>(2)</sup>	1250 hours <sup>(3)</sup>	1 ton <sup>(4)</sup>
mmBtu	hour	12-months	2000 pounds



Where:

- (1) Emission factor from AP-42 Chapter 3.2 (7/00).
- (2) Maximum capacity of the generator.
- (3) Restricted hours of operation.
- (4) Conversion rate.

[OAC rule 3745-77-07(C)(1) and PTI #P0115083]

g. Emission Limitation:

Visible PE shall not exceed 20% opacity, as six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the limitation above shall be determined in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #P0115083]

h. Emission Limitation

0.062 pound PE/mmBtu

Applicable Compliance Method

This emission limitation was established in accordance with OAC rule 3745-17-11(B)(5)(b). If required, compliance with the emission limitation shall be demonstrated in accordance with OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1) and PTI #P0115083]

g) Miscellaneous Requirements

- (1) None.



**4. P008, Generator #3**

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

Generator #3 - 9.361 MMBtu/hr (1531 HP), natural gas-fired, 4SLB, spark-ignited RICE for use as a co-generation power supply (peak shaving and waste heat recovery).

- 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(D) (PTI # P0115084, issued 09/27/2013)	Particulate matter less than or equal to ten microns in diameter (PM10) shall not exceed 0.001 lb/hr and 0.002 ton per rolling, 12-month period  Volatile organic compound (VOC) emissions shall not exceed 0.54 lbs/hr and 1.13 ton per rolling, 12-month period  Nitrogen oxide (NOx) emissions shall not exceed 3.38 lbs/hr and 7.09 tons per rolling, 12-month period  Sulfur dioxide (SO2) emissions shall not exceed 0.006 lb/hr and 0.012 ton per rolling, 12-month period  See b)(2)a. and c)(1)
b.	ORC 3704.03(T) (PTI # P0115084, issued 09/27/2013)	Carbon monoxide (CO) emissions shall not exceed 5.03 lbs/hr and 10.56 tons per rolling, 12-month period  See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)c. and b)(2)d.
d.	OAC rule 3745-31-05 (A)(3), as effective 12/01/06	See b)(2)e.
e.	OAC rule 3745-17-11(B)(5)(b)	See b)(2)f.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-18-06	See b)(2)g.
g.	OAC rule 3745-17-07(A)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by rule.
h.	40 CFR, Part 63, Subpart ZZZZ	See b)(2)h.
i.	40 CFR, Part 63, Subpart A	Per § 63.6665, Table 8 to 40 CFR Part 63, Subpart ZZZZ shows which parts of the General Provisions in §63.1 through 63.15 are applicable to Subpart ZZZZ.
j.	40 CFR Part 60 (NSPS), Subpart JJJJ	This emissions unit is exempt from the requirements of this rule because it was manufactured before July 1, 2007.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE). The federally enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(D) and are based on the operational restrictions contained in c)(1):
  - i. 0.001 lb PM10/hr; 0.002 ton PM10 per rolling, 12-month period;
  - ii. 0.006 lb SO2/hr; 0.012 ton SO2 per rolling, 12-month period;
  - iii. 0.54 lb VOC/hr; 1.13 ton VOC per rolling, 12-month period;
  - iv. 3.38 lbs NOx/hr; 7.09 tons NOx per rolling, 12-month period; and
  - v. 5.03 lbs CO/hr; 10.56 tons CO per rolling, 12-month period.
- b. The Best Available Technology (BAT) requirement for CO emissions has been determined to be compliance with the OAC rule 3745-31-05(D).
- c. The Best Available Technology (BAT) requirements for PM10, VOC, NOx and SO2 emissions under OAC rule 3745-31-05(A)(3), as effective 11/30/01, have been determined to be compliance with OAC rule 3745-31-05(D), OAC rule 3745-17-07(A) and 40 CFR, Part 63, Subpart ZZZZ.
- d. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-



31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements of 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

- e. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the PM<sub>10</sub>, SO<sub>2</sub>, VOC and NO<sub>x</sub> emissions from this air contaminant source since the calculated annual emission rate for PM<sub>10</sub>, NO<sub>x</sub>, SO<sub>2</sub> and VOC emissions is less than 10 tons/yr taking into account the federally enforceable restrictions under OAC rule 3745-31-05(D).

- f. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
- g. The emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(A).
- h. Per 63.6590(c), an affected source that meets any of the criteria in paragraphs c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR Part 60 Subpart JJJJ, for spark ignition engines. However, this engine is exempt from 40 CFR Part 60 Subpart JJJJ because it was manufactured before July 1, 2007.

c) **Operational Restrictions**

- (1) The following operational restrictions have been included in this permit for the purpose of establishing the following federally enforceable requirements which limit PTE [See b)(2)a.):

- a. The maximum annual operating hours for this emissions unit shall not exceed 4,200 hours, based upon a rolling, 12-month summation of the operating hours.

[OAC rule 3745-77-07(A)(1) and PTI #P0115084]

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

[OAC rule 3745-77-07(A)(1) and PTI #P0115084]

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

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

- a. The operating hours for each month; and
- b. The rolling, monthly summation of the operating hours.

[OAC rule 3745-77-07(C)(1) and PTI #P0115084]

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

[OAC rule 3745-77-07(C)(1) and PTI #P0115084]

e) Reporting Requirements

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

- a. All exceedances of the rolling, 12-month limitation on the hours of operation for this emissions unit;

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

[OAC rule 3745-77-07(C)(1) and PTI #P0115084]

- (2) 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.

[OAC rule 3745-15-03(A)]

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:

3.38 lbs NO<sub>x</sub>/hr

Applicable Compliance Method:

Compliance may be determined by multiplying the maximum brake horsepower of the emissions unit (1531 bph) by the manufacturer supplied emission factor of  $2.20 \times 10^{-3}$  lbs NO<sub>x</sub>/hp-hr. If required, the permittee shall demonstrate compliance with the limitation above in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0115084]

- b. Emission Limitation:

5.03 lbs CO/hr



Applicable Compliance Method:

Compliance may be determined by multiplying the maximum brake horsepower of the emissions unit (1531 bph) by the manufacturer supplied emission factor of  $3.28 \times 10^{-3}$  lbs CO/hp-hr. If required, the permittee shall demonstrate compliance with the limitation above in accordance with Methods 1 - 4 and 10 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0115084]

c. Emission Limitation:

0.54 lb VOC/hr

Applicable Compliance Method:

Compliance may be determined by multiplying the maximum brake horsepower of the emissions unit (1531 bph) by the manufacturer supplied emission factor of  $3.53 \times 10^{-4}$  lbs VOC/hp-hr. If required, the permittee shall demonstrate compliance with the limitation above in accordance with Methods 1 - 4 and 18, 25, or 25A of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0115084]

d. Emission Limitation:

0.001 lb PM10/hr

Applicable Compliance Method:

Compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu. ft./hour) by the AP-42, Table 3.2-2 emission factor for natural gas ( $7.71 \times 10^{-5}$  lbs PM10/mmBtu). If required, the permittee shall demonstrate compliance with the limitation above in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M.

[OAC rule 3745-77-07(C)(1) and PTI #P0115084]

e. Emission Limitation:

0.006 lb SO2/hr

Applicable Compliance Method:

Compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu. ft./hour) by the AP-42, Table 3.2-2 emission factor for natural gas  $5.88 \times 10^{-4}$  lbs SO2/mmBtu). If required, the



permittee shall demonstrate compliance with the limitation above in accordance with Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0115084]

f. Emission Limitations:

- 0.002 ton PM10 per rolling, 12-month period;
- 1.13 tons VOC per rolling, 12-month period;
- 7.09 tons NOx per rolling, 12-month period;
- 10.56 tons CO per rolling, 12-month period; and
- 0.012 ton SO2 per rolling, 12-month period.

Applicable Compliance Method

The above emission limitations were established based on 4,200 hours of operation per 12-month period and can be calculated, as follows:

For pollutants with emission factors specified in grams/bhp-hour:

pound pollutant <sup>(1)</sup>	1531 bhp-hr <sup>(2)</sup>	4200 hours <sup>(3)</sup>	1 ton <sup>(4)</sup>
bhp-hr		12-months	2000 pounds

Where:

- <sup>(1)</sup> Pollutant-specific emission factor, as supplied by permittee.
- <sup>(2)</sup> Maximum capacity of the generator.
- <sup>(3)</sup> Restricted hours of operation.
- <sup>(4)</sup> Conversion rates.

For pollutants with emission factors specified in pounds/mmBtu:

pound pollutant <sup>(1)</sup>	9.361 mmBtu <sup>(2)</sup>	4200 hours <sup>(3)</sup>	1 ton <sup>(4)</sup>
mmBtu	hour	12-months	2000 pounds

Where:

- <sup>(1)</sup> Emission factor from AP-42 Chapter 3.2 (7/00).
- <sup>(2)</sup> Maximum capacity of the generator.



(3) Restricted hours of operation.

(4) Conversion rate.

[OAC rule 3745-77-07(C)(1) and PTI #P0115084]

g. Emission Limitation

Visible PE shall not exceed 20% opacity as a six-minute average, except as otherwise provided by rule.

Applicable Compliance Method

This emission limitation was established in accordance with OAC rule 3745-17-07(A). If required, compliance with the visible emission limitation shall be demonstrated in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #P0115084]

g) Miscellaneous Requirements

(1) None.



**5. P009, Generator #2**

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

Generator #2 - 9.361 MMBtu/hr (1531 HP), natural gas-fired, 4SLB, spark-ignited RICE for use as a generated power supply (peak shaving).

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

(1) b)(1)h. and d)(5)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (PTI #P0117861, issued 12/10/2014)	See b)(2)a. and c)(1)
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 0.59 ton per month averaged over a 12-month rolling period</p> <p>Carbon monoxide (CO) emissions shall not exceed 1.18 tons per month averaged over a 12-month rolling period</p> <p>volatile organic compounds (VOC) emissions shall not exceed 0.41 ton per month averaged over a 12-month rolling period</p> <p>particulate Matter ≤ 10 microns in size (PM<sub>10</sub>) emissions shall not exceed 1.26 x 10<sup>-4</sup> ton per month averaged over a 12-month period</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 9.63 x 10<sup>-4</sup> ton per month averaged over a 12-month period</p> <p>See b)(2)b. and b)(2)c.</p>
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/mmBtu of actual heat input
f.	OAC rule 3745-18-06	This emissions unit is exempt from the requirements of OAC rule 3745-18-06, pursuant to OAC rule 3745-18-06(A).
g.	OAC rule 110-03(F)	This emissions unit is exempt from the requirements of OAC rule 3745-110-03 pursuant to OAC rule 3745-110-03(J)(3).
h.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(5).
i.	40 CFR, Part 60, Subpart JJJJ  In accordance with 40 CFR 60.4230, this emissions unit is subject to the New Source Performance Standards (NSPS) for Stationary Spark Ignition (SI) Internal Combustion Engines (ICE).  40 CFR 60.4231(e)  40 CFR 60.4233(e)  Table 1 to 40 CFR, Part 60, Subpart JJJJ	Uncertified, non-emergency, stationary, spark ignition, lean burn, internal combustion engine greater than 500 HP manufactured after July 1, 2010  The exhaust emissions from this engine shall not exceed:  1.0 grams of NO <sub>x</sub> per horsepower hour (1.0 g NO <sub>x</sub> /HP-hr) or 82 ppmvd at 15% O <sub>2</sub> .  2.0 grams of CO per horsepower hour (2.0 g CO/HP-hr) or 270 ppmvd at 15% O <sub>2</sub> .  0.7 gram of VOC per horsepower hour (0.7 g VOC/HP-hr) or 60 ppmvd at 15% O <sub>2</sub> .  See b)(2)e., c)(3), d)(4), e)(3) and f)(3)
j.	40 CFR 60.1 – 19 [40 CFR 60.4243]	Table 3 to Subpart JJJJ of 40 CFR Part 60 – Applicability of General Provisions to Subpart JJJJ shows which parts of the General Provisions in 40 CFR 60. 1-19 apply.
k.	40 CFR, Part 63, Subpart ZZZZ  40 CFR 63.6590(c)(1)	A new or reconstructed area source operating in compliance with Part 60 Subpart JJJJ is the demonstration of compliance for 40 CFR, Part, 63 Subpart ZZZZ.



(2) Additional Terms and Conditions

- a. This permit establishes a federally enforceable operational restriction on the hours of operation [See c)(1)] to ensure that formaldehyde emissions are in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4) through conformity with the Ohio EPA document entitled “Review of New Sources of Air Toxics Emissions, Option A” as indicated in ORC 3704.03(F)(4)(a). The federally enforceable operational restriction will result in no modeling being necessary to demonstrate compliance with the “Air Toxics Contaminant Statute”, ORC 3704.03(F)(4)(b) because the maximum annual emissions for all toxic air contaminants from P009 will be less than 1.0 ton per year [See d)(5)].
- b. The Best Available Technology (BAT) requirements under 3745-31-05(A)(3), as effective 11/30/01, for NO<sub>x</sub>, CO, VOC, SO<sub>2</sub> and PM<sub>10</sub> emissions have been determined to be compliance with the emission limitations established in b)(1)a.
- c. The permittee has satisfied the BAT requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by US EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the US EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once US EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits no longer apply.
- d. This rule paragraph applies once US EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO<sub>x</sub>, CO, VOC, SO<sub>2</sub> and PM<sub>10</sub> emissions from this air contaminant source since the potential to emit for each pollutant is less than ten tons per year, taking into account the federally enforceable restriction on the hours of operation.

- e. The permittee shall comply with the applicable requirements required under 40 CFR, Part 60, Subpart JJJ, including the following sections:

60.4233(e)	Emission standards for stationary spark ignition internal combustion engines equal to or greater than 100 HP.
60.4243(b)(2)(ii)	Keep a maintenance plan and records of conducted maintenance.  Maintain and operate the engine in a



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	<p>manner consistent with good air pollution control practices for minimizing emissions.</p> <p>Conduct an initial performance test.</p> <p>Conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first.</p>
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c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)c.]:
  - a. The maximum annual operating hours shall not exceed 4,200 hours, based upon a rolling, 12-month summation of the operating hours.

[OAC rule 3745-77-07(A)(1) and PTI #P0117861]

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

[OAC rule 3745-77-07(A)(1) and PTI #P0117861]

- (3) The permittee shall comply with the applicable restrictions required under 40 CFR, Part 60, Subpart JJJJ, including the following sections:

60.4243(g)	Operation and maintenance of air-to-fuel ratio controllers.
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[OAC rule 3745-77-07(A)(1) and PTI #P0117861]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day this emissions unit is operated, the permittee shall record the total hours of operation.

[OAC rule 3745-77-07(A)(1) and PTI #P0117861]

- (2) The permittee shall maintain monthly records of the following information:
  - a. the total monthly operating hours (summation of the daily hours of operation for each calendar month);
  - b. the permittee shall record the cumulative operating hours for each calendar month; and

c. the rolling, 12-month summation of the operating hours.

[OAC rule 3745-77-07(A)(1) and PTI #P0117861]

(3) 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.

[OAC rule 3745-77-07(A)(1) and PTI #P0117861]

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

60.4245(a)(1)	Maintain records of all notifications and documents supporting any notification required in this subpart.
60.4245(a)(2)	Maintain records of maintenance conducted on the engine.
60.4245(a)(4)	Maintain documentation that the engine meets the emission standards of this subpart.

[OAC rule 3745-77-07(A)(1) and PTI #P0117861]

(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 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO 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 ton per year may require the permittee to apply for and obtain a new PTIO.

[OAC rule 3745-77-07(A)(1) and PTI #P0117861]

e) Reporting Requirements

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

[OAC rule 3745-77-07(A)(1) and PTI #P0117861]

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



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- a. all exceedances of the rolling, 12-month limitation on the hours of operation for this emissions unit; and
- b. all exceedances of the maximum allowable cumulative hours of operation.

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

[OAC rule 3745-77-07(A)(1) and PTI #P0117861]

- (3) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 60, Subpart JJJJ, including the following sections:

60.4245(c)	Submit an initial notification as required in §60.7(a)(1), which includes the following: <ol style="list-style-type: none"> <li>1. name and address of the owner or operator;</li> <li>2. the address of the affected source;</li> <li>3. engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement;</li> <li>4. emission control equipment; and</li> <li>5. fuel used.</li> </ol>
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[OAC rule 3745-77-07(A)(1) and PTI #P0117861]

f) Testing Requirements

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

a. Emission Limitations:

0.59 ton NO<sub>x</sub> per month averaged over a 12-month rolling period

1.18 tons CO per month averaged over a 12-month rolling period

0.41 ton VOC per month averaged over a 12-month rolling period

1.26 x 10<sup>-4</sup> ton PM<sub>10</sub> per month averaged over a 12-month rolling period



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9.63 x 10<sup>-4</sup> ton SO<sub>2</sub> per month averaged over a 12-month rolling period

Applicable Compliance Method:

The above emission limitations were established based on 4,200 hours of operation per 12-month period and can be calculated, as follows:

For pollutants with emission factors specified in grams/bhp-hour:

gram pollutant <sup>(1)</sup> bhp-hr	1531 bhp-hr <sup>(2)</sup>	4200 hours <sup>(3)</sup> 1 year	1 pound <sup>(4)</sup> 453.59 gram	1 ton <sup>(4)</sup> 2000 pounds	1 year 12- months
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Where:

- (1) Pollutant-specific emission factor, as supplied by permittee.
- (2) Maximum capacity of the generator.
- (3) Restricted hours of operation.
- (4) Conversion rates.

For pollutants with emission factors specified in pounds/mmBtu:

pound pollutant <sup>(1)</sup> mmBtu	9.361 mmBtu <sup>(2)</sup> hour	4200 hours <sup>(3)</sup> 12-months	1 ton <sup>(4)</sup> 2000 pounds	1 year 12-months
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Where:

- (1) Emission factor from AP-42 Chapter 3.2 (7/00).
- (2) Maximum capacity of the generator.
- (3) Restricted hours of operation.
- (4) Conversion rate.

Therefore, provided compliance is shown with the gram/bhp-hour emission limitations and the rolling, 12-month, hours of operation restriction, compliance with the annual emission limitations shall also be demonstrated.

[OAC rule 3745-77-07(A)(1) and PTI #P0117861]

b. Emission Limitation:

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



Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be demonstrated in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(A)(1) and PTI #P0117861]

c. Emission Limitation:

PE shall not exceed 0.062 lb/mmBtu of actual heat input

Applicable Compliance Method:

If required, compliance with the emission limitation above shall be demonstrated in accordance with OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(A)(1) and PTI #P0117861]

d. Emission Limitations:

1.0 grams NO<sub>x</sub> /HP-hr or 82 ppmvd at 15% O<sub>2</sub>

2.0 grams CO/HP-hr or 270 ppmvd at 15% O<sub>2</sub>

0.7 gram VOC/HP-hr or 60 ppmvd at 15% O<sub>2</sub>

Applicable Compliance Method:

The permittee shall demonstrate compliance with the allowable NO<sub>x</sub>, CO, and VOC emission limitations above based on the results of emission testing conducted in accordance with section f)(2) of this permit.

The above emission limitations were established in accordance with the emission standards established pursuant to 40 CFR, Part 60, Subpart JJJJ. The emission limitations are reflective of emission control techniques from the use of appropriate air/fuel ratios and electronic control module (ECM) for fuel metering.

[OAC rule 3745-77-07(A)(1) and PTI #P0117861]

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

a. If the natural gas engine was purchased without an EPA certificate of conformity or is not operated as identified in the certificate of conformity or warranty for the emissions, the engine(s) will need to meet the performance testing requirements of 40 CFR 60.4243(b)(2) and the permittee will be required to conduct an initial performance test and subsequent performance tests every 8,760 hours or 3 years whichever comes first, to demonstrate compliance with the emission limits from Part 60 Subpart JJJJ.



- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for: NO<sub>x</sub>, CO, and VOC.
- c. Methods 1-4 and the following additional test methods from 40 CFR, Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rates:
- d. 

<u>Pollutant</u>	<u>Test Method</u>
NO <sub>x</sub>	Method 7
CO	Method 10
VOC	Methods 18, 25, or 25A, as appropriate
- e. Alternative U.S. EPA approved test methods may be used with prior approval from the appropriate Ohio EPA District Office or local air agency.
- f. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- h. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- 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 appropriate Ohio EPA District Office or local air agency within 60 days following completion of the test(s) pursuant to §60.4245(d).

[OAC rule 3745-77-07(A)(1) and PTI #P0117861]



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- (3) The permittee shall comply with the applicable testing requirements under 40 CFR, Part 60, Subpart JJJJ, including the following sections:

60.4244(a) through (g)	Performance test procedures.
60.4245(d)	Submit a copy of each performance test conducted pursuant to this subpart within 60 days after the test has been completed.

[OAC rule 3745-77-07(A)(1) and PTI #P0117861]

g) Miscellaneous Requirements

- (1) None.

**6. R006, E-Brite #2 Base Coat**

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

E-Brite No. 2 Base Coat - Binks base coat spray booth with HVLP robotic application

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 03-17180 issued April 3, 2007)	9.79 lbs organic compounds (OC)/hr from coating operations  The OC content of any cleanup material employed shall not exceed 7.51 lbs OC/gallon.  See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI 03-17180 issued April 3, 2007)	230.0 tons of OC per rolling, 12-month period from the coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined  9.90 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emissions units K001, K002, R006-R015, and R021, combined]  See b)(2)b.
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).

(2) Additional Terms and Conditions

a. The hourly emission limitation of 9.79 lbs OC/hr from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring,



record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding the applicability of Maximum Achievable Control Technology (MACT) regulations and maintains the facility as a minor source for attainment New Source Review:

230.0 tons of OC per rolling, 12-month period from the coating and cleanup operations [for emissions units K001, K002, R006-R015, and R021, combined] based on a coating/cleanup usage restriction [See c)(1)]. For purposes of federally enforceability an emission limitation on OC effectively limits emissions of volatile organic compounds (VOC).

Annual HAP emissions from emissions units K001, K002, R006-R015, and R021, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

Rolling emission limitations were established in Permit to Install (PTI) #03-17180 issued on 04/103/07 and, as such, rolling emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} \leq 230.0$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = OC content in pounds per gallon of each coating/cleanup employed;

G<sub>i</sub> = Gallons used of each coating and cleanup material for the rolling 12-month period

n = total number of unique coatings and cleanup materials employed in emission units K001, K002, R006-R015, and R021.

[OAC rule 3745-77-07(A)(1) and PTI #03-17180]

- (2) The permittee shall operate the waterwash system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the waterwash

in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

- (3) In the event the waterwash control system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

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

- (1) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined:
- a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleanup material employed;
  - d. the OC emission rate for each coating and cleanup material employed [d)(1)b. x d)(1)c.], in pounds; and
  - e. the rolling, 12-month OC emissions, for all coatings and cleanup materials, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (2) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, R006-R015, and R021, combined:
- a. the name and identification number of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(2)b. x d)(2)c.] for each individual HAP, in lbs;



- e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed [for each individual HAP, the summation of d)(2)d. for all coatings and cleanup materials], in lbs; and
- f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed [summation of d)(2)e. for all HAPs for all coatings and cleanup materials], in lbs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (4) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (6) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (7) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the rolling, 12-month quantity of coatings and cleanup materials employed as specified in section c)(1) (for emissions units K001, K002, R006-R015, and R021, combined);
  - b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K001, K002, R006-R015, and R021, combined); and
  - c. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

These reports shall be submitted in accordance with the standard terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1); OAC rule 3745-17-11(C); PTI #03-17180]

- (2) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any cleanup material which exceeds an OC content of 7.51 lbs OC/gallon. These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (3) 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.

[OAC rule 3745-15-03(A)]

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:

9.79 lbs OC/hr, from coatings operations

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (1.80 gallons per hour) by the maximum OC content of all the coatings (5.44 pounds per gallon). If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

b. Emission Limitation:

230.0 tons of OC per rolling, 12-month period, from coating and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

c. Emission Limitation:

9.90 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emission units K001, K002, R006-R015, and R021, combined]

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

d. Emission Limitation:

The OC content of any cleanup material employed shall not exceed 7.51 lbs OC/gallon.



**Proposed Title V Permit**  
Jay Plastics, Inc.  
**Permit Number:** P0121763  
**Facility ID:** 0370010058

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

Applicable Compliance Method:

Compliance with the OC content limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

g) Miscellaneous Requirements

(1) None.

**7. R007, E-Brite Line #1**

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

E-Brite No. 1 Base Coat - Binks base coat spray booth with HVLP robotic application

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 03-17180 issued April 3, 2007)	8.48 lbs organic compounds (OC)/hr from coating operations.  The OC content of any cleanup material employed shall not exceed 7.51 lbs OC/gallon.  See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI 03-17180 issued April 3, 2007)	230.0 tons of OC per rolling, 12-month period from the coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined  9.90 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emissions units K001, K002, R006-R015, and R021, combined]  See b)(2)b.
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).

(2) Additional Terms and Conditions

a. The hourly emission limitation of 8.48 lbs OC/hr from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring,



record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding the applicability of Maximum Achievable Control Technology (MACT) regulations and maintains the facility as a minor source for attainment New Source Review:

230.0 tons of OC per rolling, 12-month period from the coating and cleanup operations [for emissions units K001, K002, R006-R015, and R021, combined] based on a coating/cleanup usage restriction [See c)(1)]. For purposes of federally enforceability an emission limitation on OC effectively limits emissions of volatile organic compounds (VOC).

Annual HAP emissions from emissions units K001, K002, R006-R015, and R021, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

Rolling emission limitations were established in Permit to Install (PTI) #03-17180 issued on 04/03/07 and, as such, rolling emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} \leq 230.0$$

where,

M = the increment of the rolling 12-month period;

Vi = OC content in pounds per gallon of each coating/cleanup employed;

Gi = Gallons used of each coating and cleanup material for the rolling 12-month period

n = total number of unique coatings and cleanup materials employed in emission units K001, K002, R006-R015, and R021.

[OAC rule 3745-77-07(A)(1) and PTI #03-17180]

- (2) The permittee shall operate the waterwash system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the waterwash

in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

- (3) In the event the waterwash control system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

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

- (1) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined:
- a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleanup material employed;
  - d. the OC emission rate for each coating and cleanup material employed [d)(1)b. x d)(1)c.], in pounds; and
  - e. the rolling, 12-month OC emissions, for all coatings and cleanup materials, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (2) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, R006-R015, and R021, combined:
- a. the name and identification number of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(2)b. x d)(2)c.] for each individual HAP, in lbs;



- e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed [for each individual HAP, the summation of d)(2)d. for all coatings and cleanup materials], in lbs; and
- f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed [summation of d)(2)e. for all HAPs for all coatings and cleanup materials], in lbs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (4) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (6) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (7) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the rolling, 12-month quantity of coatings and cleanup materials employed as specified in section c)(1) (for emissions units K001, K002, R006-R015, and R021, combined);
  - b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K001, K002, R006-R015, and R021, combined); and
  - c. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

These reports shall be submitted in accordance with the standard terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1); OAC rule 3745-17-11(C); PTI #03-17180]

- (2) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any cleanup material which exceeds an OC content of 7.51 lbs OC/gallon. These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (3) 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.

[OAC rule 3745-15-03(A)]

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:

8.48 lbs OC/hr, from coatings operations

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (1.56 gallons per hour) by the maximum OC content of all the coatings (5.44 pounds per gallon). If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

b. Emission Limitation:

230.0 tons of OC per rolling, 12-month period, from coating and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

c. Emission Limitation:

9.90 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emission units K001, K002, R006-R015, and R021, combined]

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

d. Emission Limitation:

The OC content of any cleanup material employed shall not exceed 7.51 lbs OC/gallon.



**Proposed Title V Permit**  
Jay Plastics, Inc.  
**Permit Number:** P0121763  
**Facility ID:** 0370010058

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

Applicable Compliance Method:

Compliance with the OC content limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

g) Miscellaneous Requirements

(1) None.



**8. R008, Paint Line #2 Base Coat**

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

J-Car Base Coat - TBI Industries Base coat spray booth, paint mixing room for Line #2 with HVLP robotic application.

- 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 03-17180 issued April 3, 2007)	40.3 lbs organic compounds (OC)/hr from coating operations.  The OC content of any cleanup material employed shall not exceed 7.51 lbs OC/gallon.  See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI 03-17180 issued April 3, 2007)	230.0 tons of OC per rolling, 12-month period from the coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined  9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emissions units K001, K002, R006-R015, and R021, combined]  See b)(2)b.
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).

(2) Additional Terms and Conditions

- a. The hourly emission limitation of 40.3 lbs OC/hr from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding the applicability of Maximum Achievable Control Technology (MACT) regulations and maintains the facility as a minor source for attainment New Source Review:

230.0 tons of OC per rolling, 12-month period from the coating and cleanup operations [for emissions units K001, K002, R006-R015, and R021, combined] based on a coating/cleanup usage restriction [See c)(1)]. For purposes of federally enforceability an emission limitation on OC effectively limits emissions of volatile organic compounds (VOC).

Annual HAP emissions from emissions units K001, K002, R006-R015, and R021, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

Rolling emission limitations were established in Permit to Install (PTI) #03-17180 issued on 04/03/07 and, as such, rolling emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} \leq 230.0$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = OC content in pounds per gallon of each coating/cleanup employed;

G<sub>i</sub> = Gallons used of each coating and cleanup material for the rolling 12-month period

n = total number of unique coatings and cleanup materials employed in emission units K001, K002, R006-R015, and R021.

[OAC rule 3745-77-07(A)(1) and PTI #03-17180]

- (2) The permittee shall operate the waterwash system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the waterwash in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1); OAC rule 3745-17-11(C)]

- (3) In the event the waterwash control system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1); OAC rule 3745-17-11(C)]

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

- (1) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined:
- a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleanup material employed;
  - d. the OC emission rate for each coating and cleanup material employed [d)(1)b. x d)(1)c.], in pounds; and
  - e. the rolling, 12-month OC emissions, for all coatings and cleanup materials, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (2) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, R006-R015, and R021, combined:
- a. the name and identification number of each coating and cleanup material employed;

- b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
- c. the number of gallons of each coating and cleanup material employed;
- d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(2)b. x d)(2)c, for each individual HAP], in lbs;
- e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed [for each individual HAP, the summation of d)(2)d. for all coatings and cleanup materials], in lbs; and
- f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed [summation of d)(2)e. for all HAPs for all coatings and cleanup materials], in lbs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (4) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (6) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (7) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the rolling, 12-month quantity of coatings and cleanup materials employed as specified in section c)(1) (for emissions units K001, K002, R006-R015, and R021, combined);
  - b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K001, K002, R006-R015, and R021, combined); and
  - c. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

These reports shall be submitted in accordance with the standard terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1); OAC rule 3745-17-11(C); PTI #03-17180]

- (2) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any cleanup material which exceeds an OC content of 7.51 lbs OC/gallon. These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]



- (3) 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.

[OAC rule 3745-15-03(A)]

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:

40.3 lbs OC/hr, from coatings operations

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (6.48 gallons per hour) by the maximum OC content of all the coatings (6.22 pounds per gallon). If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- b. Emission Limitation:

230.0 tons of OC per rolling, 12-month period, from coating and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- c. Emission Limitation:

9.90 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emission units K001, K002, R006-R015, and R021, combined]

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in d)(2) of this permit.



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[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

d. Emission Limitation:

The OC content of any cleanup material employed shall not exceed 7.51 lbs OC/gallon.

Applicable Compliance Method:

Compliance with the OC content limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

g) Miscellaneous Requirements

(1) None.



**9. R009, Paint Line #2 Clear Coat**

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

J-Car Clear Coat - Custom clear coat spray booth, paint mixing room for Line #2 with HVLP robotic application

- 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 03-17180 issued April 3, 2007)	13.2 lbs organic compounds (OC)/hr from coating operations.  The OC content of any cleanup material employed shall not exceed 7.51 lbs OC/gallon.  See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI 03-17180 issued April 3, 2007)	230.0 tons of OC per rolling, 12-month period from the coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined  9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emissions units K001, K002, R006-R015, and R021, combined]  See b)(2)b.
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).

(2) Additional Terms and Conditions

- a. The hourly emission limitation of 13.2 lbs OC/hr from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding the applicability of Maximum Achievable Control Technology (MACT) regulations and maintains the facility as a minor source for attainment New Source Review:

230.0 tons of OC per rolling, 12-month period from the coating and cleanup operations [for emissions units K001, K002, R006-R015, and R021, combined] based on a coating/cleanup usage restriction [See c)(1)]. For purposes of federal enforceability an emission limitation on OC effectively limits emissions of volatile organic compounds (VOC).

Annual HAP emissions from emissions units K001, K002, R006-R015, and R021, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

Rolling emission limitations were established in Permit to Install (PTI) #03-17180 issued on 04/03/07 and, as such, rolling emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} \leq 230.0$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = OC content in pounds per gallon of each coating/cleanup employed;

G<sub>i</sub> = Gallons used of each coating and cleanup material for the rolling 12-month period

n = total number of unique coatings and cleanup materials employed in emission units K001, K002, R006-R015, and R021.

[OAC rule 3745-77-07(A)(1) and PTI #03-17180]

- (2) The permittee shall operate the waterwash system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the waterwash in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

- (3) In the event the waterwash control system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

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

- (1) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleanup material employed;
  - d. the OC emission rate for each coating and cleanup material employed [d)(1)b. x d)(1)c.], in pounds; and
  - e. the rolling, 12-month OC emissions, for all coatings and cleanup materials, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (2) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, R006-R015, and R021, combined:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;



- d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(2)b. x d)(2)c. for each individual HAP], in lbs;
- e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed [for each individual HAP, the summation of d)(2)d. for all coatings and cleanup materials], in lbs; and
- f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed [summation of d)(2)e. for all HAPs for all coatings and cleanup materials], in lbs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (4) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (6) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (7) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the rolling, 12-month quantity of coatings and cleanup materials employed as specified in section c)(1) (for emissions units K001, K002, R006-R015, and R021, combined);
  - b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K001, K002, R006-R015, and R021, combined); and
  - c. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

These reports shall be submitted in accordance with the standard terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1); OAC rule 3745-17-11(C); PTI #03-17180]

- (2) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any cleanup material which exceeds an OC content of 7.51 lbs OC/gallon. These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]



- (3) 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.

[OAC rule 3745-15-03(A)]

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:

13.2 lbs OC/hr, from coatings operations

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (2.40 gallons per hour) by the maximum OC content of all the coatings (5.52 pounds per gallon). If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

b. Emission Limitation:

230.0 tons of OC per rolling, 12-month period, from coating and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

c. Emission Limitation:

9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emission units K001, K002, R006-R015, and R021, combined]



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Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

d. Emission Limitation:

The OC content of any cleanup material employed shall not exceed 7.51 lbs OC/gallon.

Applicable Compliance Method:

Compliance with the OC content limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

g) Miscellaneous Requirements

(1) None.

**10. R010, E-Brite #3 Base Coat**

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

E-Brite No. 3 Base Coat - Custom base coat spray booth with HVLP robotic application

- 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 03-17180 issued April 3, 2007)	10.6 lbs organic compounds (OC)/hr from coating operations.  The OC content of any cleanup material employed shall not exceed 7.51 lbs OC/gallon.  See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI 03-17180 issued April 3, 2007)	230.0 tons of OC per rolling, 12-month period from the coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined  9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emissions units K001, K002, R006-R015, and R021, combined]  See b)(2)b.
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).

- (2) Additional Terms and Conditions
  - a. The hourly emission limitation of 10.6 lbs OC/hr from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring,



record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding the applicability of Maximum Achievable Control Technology (MACT) regulations and maintains the facility as a minor source for attainment New Source Review:

230.0 tons of OC per rolling, 12-month period from the coating and cleanup operations [for emissions units K001, K002, R006-R015, and R021, combined] based on a coating/cleanup usage restriction [See c)(1)]. For purposes of federally enforceability an emission limitation on OC effectively limits emissions of volatile organic compounds (VOC).

Annual HAP emissions from emissions units K001, K002, R006-R015, and R021, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

Rolling emission limitations were established in Permit to Install (PTI) #03-17180 issued on 04/03/07 and, as such, rolling emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} \leq 230.0$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = OC content in pounds per gallon of each coating/cleanup employed;

G<sub>i</sub> = Gallons used of each coating and cleanup material for the rolling 12-month period

n = total number of unique coatings and cleanup materials employed in emission units K001, K002, R006-R015, and R021.

[OAC rule 3745-77-07(A)(1) and PTI #03-17180]

- (2) The permittee shall operate the waterwash system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the waterwash

in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

- (3) In the event the waterwash control system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

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

- (1) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined:
- a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleanup material employed;
  - d. the OC emission rate for each coating and cleanup material employed [d)(1)b. x d)(1)c.] in pounds; and
  - e. the rolling, 12-month OC emissions, for all coatings and cleanup materials, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (2) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, R006-R015, and R021, combined:
- a. the name and identification number of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(2)b. x d)(2)c. for each individual HAP], in lbs;



- e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed [for each individual HAP, the summation of d)(2)d. for all coatings and cleanup materials], in lbs; and
- f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed [summation of d)(2)e. for all HAPs for all coatings and cleanup materials], in lbs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (4) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (6) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (7) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the rolling, 12-month quantity of coatings and cleanup materials employed as specified in section c)(1) (for emissions units K001, K002, R006-R015, and R021, combined);
  - b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K001, K002, R006-R015, and R021, combined); and
  - c. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

These reports shall be submitted in accordance with the standard terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1); OAC rule 3745-17-11(C); PTI #03-17180]

- (2) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any cleanup material which exceeds an OC content of 7.51 lbs OC/gallon. These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (3) 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.

[OAC rule 3745-15-03(A)]

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:

10.6 lbs OC/hr, from coatings operations

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (2.28 gallons per hour) by the maximum OC content of all the coatings (4.64 pounds per gallon). If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

b. Emission Limitation:

230.0 tons of OC per rolling, 12-month period, from coating and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

c. Emission Limitation:

9.90 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emission units K001, K002, R006-R015, and R021, combined]

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

d. Emission Limitation:

The OC content of any cleanup material employed shall not exceed 7.51 lbs OC/gallon.



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Jay Plastics, Inc.  
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**Facility ID:** 0370010058

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Applicable Compliance Method:

Compliance with the OC content limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

g) Miscellaneous Requirements

(1) None.

**11. R011, E-Brite #4 Base Coat and IR/UV oven**

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

E-Brite No. 4 Base Coat - Custom base coat spray booth with HVLP robotic application

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 03-17180 issued April 3, 2007)	8.35 lbs organic compounds (OC)/hr from coating operations.  The OC content of any cleanup material employed shall not exceed 7.51 lbs OC/gallon.  See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI 03-17180 issued April 3, 2007)	230.0 tons of OC per rolling, 12-month period from the coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined  9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emissions units K001, K002, R006-R015, and R021, combined]  See b)(2)b.
c.	OAC rule 3745-17-11(C)	See b)(2)c.

(2) Additional Terms and Conditions

a. The hourly emission limitation of 8.35 lbs OC/hr from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring,



record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding the applicability of Maximum Achievable Control Technology (MACT) regulations and maintains the facility as a minor source for attainment New Source Review:

230.0 tons of OC per rolling, 12-month period from the coating and cleanup operations [for emissions units K001, K002, R006-R015, and R021, combined] based on a coating/cleanup usage restriction [See c)(1)]. For purposes of federally enforceability an emission limitation on OC effectively limits emissions of volatile organic compounds (VOC).

Annual HAP emissions from emissions units K001, K002, R006-R015, and R021, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

Rolling emission limitations were established in Permit to Install (PTI) #03-17180 issued on 04/03/07 and, as such, rolling emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} \leq 230.0$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = OC content in pounds per gallon of each coating/cleanup employed;

G<sub>i</sub> = Gallons used of each coating and cleanup material for the rolling 12-month period

n = total number of unique coatings and cleanup materials employed in emission units K001, K002, R006-R015, and R021.

[OAC rule 3745-77-07(A)(1) and PTI #03-17180]

- (2) The permittee shall operate the waterwash system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the waterwash in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

- (3) In the event the waterwash control system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

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

- (1) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined:

- a. the name and identification number of each coating and cleanup material employed;
- b. the OC content of each coating and cleanup material employed, in pounds per gallon, as applied;
- c. the volume, in gallons, of each coating and cleanup material employed;
- d. the OC emission rate for each coating and cleanup material employed [d)(1)b. x d)(1)c.], in pounds; and
- e. the rolling, 12-month OC emissions, for all coatings and cleanup materials, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (2) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, R006-R015, and R021, combined:

- a. the name and identification number of each coating and cleanup material employed;
- b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
- c. the number of gallons of each coating and cleanup material employed;

- d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(2)b. x d)(2)c. for each individual HAP], in lbs;
- e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed [for each individual HAP, the summation of d)(2)d. for all coatings and cleanup materials], in lbs; and
- f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed [summation of d)(2)e. for all HAPs for all coatings and cleanup materials], in lbs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (4) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (6) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (7) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the rolling, 12-month quantity of coatings and cleanup materials employed as specified in section c)(1) (for emissions units K001, K002, R006-R015, and R021, combined);
  - b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K001, K002, R006-R015, and R021, combined); and
  - c. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

These reports shall be submitted in accordance with the standard terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1); OAC rule 3745-17-11(C); PTI #03-17180]

- (2) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any cleanup material which exceeds an OC content of 7.51 lbs OC/gallon. These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (3) 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.

[OAC rule 3745-15-03(A)]

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:

8.35 lbs OC/hr, from coatings operations

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (1.80 gallons per hour) by the maximum OC content of all the coatings (4.64 pounds per gallon). If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

b. Emission Limitation:

230.0 tons of OC per rolling, 12-month period, from coating and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

c. Emission Limitation:

9.90 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emission units K001, K002, R006-R015, and R021, combined]

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]



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Jay Plastics, Inc.  
**Permit Number:** P0121763  
**Facility ID:** 0370010058

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

d. Emission Limitation:

The OC content of any cleanup material employed shall not exceed 7.51 lbs OC/gallon.

Applicable Compliance Method:

Compliance with the OC content limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

g) Miscellaneous Requirements

(1) None.

**12. R012, E-Brite #5 Base Coat**

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

E-Brite No. 5 base Coat - Custom base coat spray booth with HVLP robotic application

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 03-17180 issued April 3, 2007)	11.1 lbs organic compounds (OC)/hr from coating operations.  The OC content of any cleanup material employed shall not exceed 7.51 lbs OC/gallon.  See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI 03-17180 issued April 3, 2007)	230.0 tons of OC per rolling, 12-month period from the coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined  9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emissions units K001, K002, R006-R015, and R021, combined]  See b)(2)b.
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).

(2) Additional Terms and Conditions

a. The hourly emission limitation of 11.1 lbs OC/hr from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring,



record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding the applicability of Maximum Achievable Control Technology (MACT) regulations and maintains the facility as a minor source for attainment New Source Review:

230.0 tons of OC per rolling, 12-month period from the coating and cleanup operations [for emissions units K001, K002, R006-R015, and R021, combined] based on a coating/cleanup usage restriction [See c)(1)]. For purposes of federally enforceability an emission limitation on OC effectively limits emissions of volatile organic compounds (VOC).

Annual HAP emissions from emissions units K001, K002, R006-R015, and R021, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

Rolling emission limitations were established in Permit to Install (PTI) #03-17180 issued on 04/03/07 and, as such, rolling emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} \leq 230.0$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = OC content in pounds per gallon of each coating/cleanup employed;

G<sub>i</sub> = Gallons used of each coating and cleanup material for the rolling 12-month period

n = total number of unique coatings and cleanup materials employed in emission units K001, K002, R006-R015, and R021.

[OAC rule 3745-77-07(A)(1) and PTI #03-17180]

- (2) The permittee shall operate the waterwash system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the waterwash

in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

- (3) In the event the waterwash control system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

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

- (1) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined:
- a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleanup material employed;
  - d. the OC emission rate for each coating and cleanup material employed [d)(1)b. x d)(1)c.], in pounds; and
  - e. the rolling, 12-month OC emissions, for all coatings and cleanup materials, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (2) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, R006-R015, and R021, combined:
- a. the name and identification number of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(2)b. x d)(2)c. for each individual HAP], in lbs;



- e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed [for each individual HAP, the summation of d)(2)d. for all coatings and cleanup materials], in lbs; and
- f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed [summation of d)(2)e. for all HAPs for all coatings and cleanup materials], in lbs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (4) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (6) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (7) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the rolling, 12-month quantity of coatings and cleanup materials employed as specified in section c)(1) (for emissions units K001, K002, R006-R015, and R021, combined);
  - b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K001, K002, R006-R015, and R021, combined); and
  - c. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation

These reports shall be submitted in accordance with the standard terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1); OAC rule 3745-17-11(C); PTI #03-17180]

- (2) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any cleanup material which exceeds an OC content of 7.51 lbs OC/gallon. These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

- (3) 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.

[OAC rule 3745-15-03(A)]

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:

11.1 lbs OC/hr, from coatings operations

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (3.00 gallons per hour) by the maximum OC content of all the coatings (3.71 pounds per gallon). If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

b. Emission Limitation:

230.0 tons of OC per rolling, 12-month period, from coating and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

c. Emission Limitation:

9.90 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emission units K001, K002, R006-R015, and R021, combined]

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

d. Emission Limitation:

The OC content of any cleanup material employed shall not exceed 7.51 lbs OC/gallon.

Applicable Compliance Method:

Compliance with the OC content limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.



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**Facility ID:** 0370010058

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[OAC rule 3745-77-07(C)(1) and PTI #03-17180]

g) Miscellaneous Requirements

(1) None.

**13. R013, E-Brite #1 Top Coat**

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

E-brite No. 1 Top Coat Booth - Custom Spray Booth

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 P0112187 issued December 12, 2012)	9.0 lbs organic compounds (OC)/hr from coating operations  The OC content of any cleanup material employed shall not exceed 7.51 lbs OC/gallon.  See b)(2)b.
b.	OAC rule 3745-31-05(D) (PTI P0112187 issued December 12, 2012)	230.0 tons of OC per rolling, 12-month period from the coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined  9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emissions units K001, K002, R006-R015, and R021, combined]  See b)(2)e.
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).

(2) Additional Terms and Conditions

a. The hourly emission limitation of 9.0 lbs OC/hr from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring,



record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding the applicability of Maximum Achievable Control Technology (MACT) regulations and maintains the facility as a minor source for attainment New Source Review:

230.0 tons of OC per rolling, 12-month period from the coating and cleanup operations [for emissions units K001, K002, R006-R015, and R021, combined] based on a coating/cleanup usage restriction [See c)(1)]. For purposes of federally enforceability an emission limitation on OC effectively limits emissions of volatile organic compounds (VOC).

Annual HAP emissions from emissions units K001, K002, R006-R015, and R021, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

Rolling emission limitations were established in Permit to Install (PTI) #03-17260 issued on 05/17/11 and, as such, rolling emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} \leq 230.0$$

where,

M = the increment of the rolling 12-month period;

Vi = OC content in pounds per gallon of each coating/cleanup employed;

Gi = Gallons used of each coating and cleanup material for the rolling 12-month period

n = total number of unique coatings and cleanup materials employed in emission units K001, K002, R006-R015, and R021.

[OAC rule 3745-77-07(A)(1) and PTI # P0112187]

- (2) The permittee shall operate the waterwash system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the waterwash

in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

- (3) In the event the waterwash control system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)]

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

- (1) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined:
- a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleanup material employed;
  - d. the OC emission rate for each coating and cleanup material employed [d)(1)b. x d)(1)c.], in pounds; and
  - e. the rolling, 12-month OC emissions, for all coatings and cleanup materials, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI # P0112187]

- (2) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, R006-R015, and R021, combined:
- a. the name and identification number of each coating and cleanup material employed;
  - b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(2)b. x d)(2)c. for each individual HAP, in lbs;



- e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed [for each individual HAP, the summation of d)(2)d. for all coatings and cleanup materials], in lbs; and
- f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed [summation of d)(2)e. for all HAPs for all coatings and cleanup materials], in lbs.

[OAC rule 3745-77-07(C)(1) and PTI # P0112187]

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (4) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (6) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

- (7) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the rolling, 12-month quantity of coatings and cleanup materials employed as specified in section c)(1) (for emissions units K001, K002, R006-R015, and R021, combined);
  - b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K001, K002, R006-R015, and R021, combined); and
  - c. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

These reports shall be submitted in accordance with the standard terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1); OAC rule 3745-17-11(C); PTI # P0112187]

- (2) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any cleanup material which exceeds an OC content of 7.351 lbs OC/gallon. These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI # P0112187]

- (3) 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.

[OAC rule 3745-15-03(A)]

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:

9.0 lbs OC/hr, from coatings operations

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (3.00 gallons per hour) by the maximum OC content of all the coatings (3.00 pounds per gallon). If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI # P0112187]

b. Emission Limitation:

230.0 tons of OC per rolling, 12-month period, from coating and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI # P0112187]

c. Emission Limitation:

9.90 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emission units K001, K002, R006-R015, and R021, combined]

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI # P0112187]

d. Emission Limitation:

The OC content of any cleanup material employed shall not exceed 7.51 lbs OC/gallon.



**Proposed Title V Permit**  
Jay Plastics, Inc.  
**Permit Number:** P0121763  
**Facility ID:** 0370010058

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

Applicable Compliance Method:

Compliance with the OC content limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0112187]

g) Miscellaneous Requirements

(1) None.

**14. R014, Ebrite #506 top coat booth**

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

Top Coat Booth

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

(1) b)(1)d., d)(7) – d)(10).

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 03-17403 issued June 12, 2008)	10.35 lbs organic compounds (OC)/hr from coating operations.  The OC content of any cleanup material employed shall not exceed 7.34 lbs OC/gallon.  See b)(2)b.
b.	OAC rule 3745-31-05(D) (PTI 03-17403 issued June 12, 2008)	230.0 tons of OC per rolling, 12-month period from the coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined  9.90 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emissions units K001, K002, R006-R015, and R021, combined]  See b)(2)e.
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).
d.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(7) – d)(10).

(2) Additional Terms and Conditions

- a. The hourly emission limitation of 10.35 lbs OC/hr from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding the applicability of Maximum Achievable Control Technology (MACT) regulations and maintains the facility as a minor source for attainment New Source Review:

230.0 tons of OC per rolling, 12-month period from the coating and cleanup operations [for emissions units K001, K002, R006-R015, and R021, combined] based on a coating/cleanup usage restriction [See c)(1)]. For purposes of federal enforceability an emission limitation on OC effectively limits emissions of volatile organic compounds (VOC).

Annual HAP emissions from emissions units K001, K002, R006-R015, and R021, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

Rolling emission limitations were established in Permit to Install (PTI) #03-17403 issued on 06/12/08 and, as such, rolling emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} \leq 230.0$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = OC content in pounds per gallon of each coating/cleanup employed;

G<sub>i</sub> = Gallons used of each coating and cleanup material for the rolling 12-month period

n = total number of unique coatings and cleanup materials employed in emission units K001, K002, R006-R015, and R021.

[OAC rule 3745-77-07(A)(1) and PTI #03-17403]

- (2) The permittee shall operate the waterwash system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the waterwash in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1) and PTI #03-17403]

- (3) In the event the waterwash control system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and PTI #03-17403]

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

- (1) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined:
- a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleanup material employed;
  - d. the OC emission rate for each coating and cleanup material employed [d)(1)b. x d)(1)c.], in pounds; and
  - e. the rolling, 12-month OC emissions, for all coatings and cleanup materials, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17403]

- (2) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, R006-R015, and R021, combined:
- a. the name and identification number of each coating and cleanup material employed;

- b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
- c. the number of gallons of each coating and cleanup material employed;
- d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(2)b. x d)(2)c. for each individual HAP, in lbs;
- e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed [for each individual HAP, the summation of d)(2)d. for all coatings and cleanup materials], in lbs; and
- f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed [summation of d)(2)e. for all HAPs for all coatings and cleanup materials], in lbs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17403]

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and PTI #03-17403]

- (4) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #03-17403]

- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and PTI #03-17403]

- (6) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and PTI #03-17403]

- (7) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #03-17403]

- (8) The permit to install for emissions unit R014 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit application. The Ohio EPA's "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices";  
or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC).
- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic contaminant: Toluene  
TLV (mg/m<sup>3</sup>): 375  
Maximum Hourly Emission Rate (lbs/hr): 0.67  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 5.16  
MAGLC (ug/m<sup>3</sup>): 8929

Toxic contaminant: Xylene  
TLV (mg/m<sup>3</sup>): 435  
Maximum Hourly Emission Rate (lbs/hr): 0.34  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 2.62  
MAGLC (ug/m<sup>3</sup>): 10357

The permittee, has demonstrated that emissions of Toluene, and Xylene from emissions unit R014, are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic contaminant in accordance with ORC 3704.03(F).

[PTI 03-17403]

- (9) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

[PTI 03-17403]

- (10) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s)
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[PTI 03-17403]

- (11) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[PTI 03-17403]

e) Reporting Requirements

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



- a. all exceedances of the rolling, 12-month quantity of coatings and cleanup materials employed as specified in section c)(1) (for emissions units K001, K002, R006-R015, and R021, combined).
- b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K001, K002, R006-R015, and R021, combined).
- c. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation

These reports shall be submitted in accordance with the standard terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17403]

- (2) The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any cleanup material which exceeds an OC content of 7.34 lbs OC/gallon. These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #03-17403]

- (3) 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.

[OAC rule 3745-15-03(A)]

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:

10.35 lbs OC/hr, from coatings operations

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (1.50 gallons per hour) by the maximum OC content of all the coatings (6.90 pounds per gallon). If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.



[OAC rule 3745-77-07(C)(1) and PTI #03-17403]

b. Emission Limitation:

230.0 tons of OC per rolling, 12-month period, from coating and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined.

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17403]

c. Emission Limitation:

9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emission units K001, K002, R006-R015, and R021, combined]

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17403]

d. Emission Limitation:

The OC content of any cleanup material employed shall not exceed 7.34 lbs OC/gallon.

Applicable Compliance Method:

Compliance with the OC content limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17403]

g) Miscellaneous Requirements

- (1) None.

**15. R015, Ebrite #4 Top coat booth and IR/UV oven**

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

Top Coat Booth

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

(1) b)(1)d., d)(8).

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) (PTI #P0106239 issued October 13, 2010)	9.10 lbs organic compounds (OC)/hr, from coating operations  The OC content of any cleanup material employed shall not exceed 7.34 lbs OC/gallon.  See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI #P0106239 issued October 13, 2010)	230.0 tons of OC per rolling, 12-month period from the coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined  9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emissions units K001, K002, R006-R015 and R021, combined]  See b)(2)b.
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).
d.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(8).

(2) Additional Terms and Conditions

- a. The BAT requirements of ORC 3704.03(T) have been determined to be the establishment of emission limitations in section b)(1)a.

\*The hourly emission limitation of 9.10 lbs OC/hr from the coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding the applicability of Maximum Achievable Control Technology (MACT) regulations and maintains the facility as a minor source for attainment New Source Review:

230.0 tons of OC per rolling, 12-month period from the coating and cleanup operations [for emissions units K001, K002, R006-R015, and R021, combined] based on a coating/cleanup usage restriction [See c)(1)]. For purposes of federal enforceability an emission limitation on OC effectively limits emissions of volatile organic compounds (VOC).

Annual HAP emissions from emissions units K001, K002, R006-R015, and R021, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

Rolling emission limitations were established in Permit to Install (PTI) P0106239 issued on 10/13/2010 and, as such, rolling emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} \leq 230.0$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = OC content in pounds per gallon of each coating/cleanup employed;

G<sub>i</sub> = Gallons used of each coating and cleanup material for the rolling 12-month period

n = total number of unique coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021.

[OAC rule 3745-77-07(A)(1) and PTI #P0106239]

- (2) The permittee shall operate the waterwash system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the waterwash in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1) and PTI #P0106239]

- (3) In the event the waterwash control system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and PTI #P0106239]

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

- (1) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined:
- a. the name and identification number of each coating and cleanup material employed;
  - b. the OC content of each coating and cleanup material employed, in pounds per gallon, as applied;
  - c. the volume, in gallons, of each coating and cleanup material employed;
  - d. the OC emission rate for each coating and cleanup material employed (b times c), in pounds.
  - e. the cumulative monthly OC emission rate for all coatings and cleanup materials employed (summation of d), in tons; and
  - f. the rolling, 12-month OC emissions, for all coatings and cleanup materials, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #P0106239]

- (2) The permittee shall collect and record the following HAP information each month for emissions units K001, K002, R006-R015, and R021, combined:



- a. the name and identification number of each coating and cleanup material employed;
- b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;
- c. the number of gallons of each coating and cleanup material employed;
- d. the emission rate for each individual HAP from each coating and cleanup material employed (b times c) for each individual HAP, in lbs;
- e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d for all coatings and cleanup materials), in lbs;
- f. the total HAP emission rate for all HAPs, combined from all the coatings and cleanup materials employed (summation of e for all HAPs for all coatings and cleanup materials), in lbs; and
- g. the rolling, 12-month emissions of each individual HAP and all HAPs, combined, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #P0106239]

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0106239]

- (4) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0106239]

- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and PTI #P0106239]

- (6) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
- a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and PTI #P0106239]

- (7) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0106239]

- (8) Modeling to demonstrate compliance with, the [Toxic Air Contaminant Statute], ORC 3704.03(F)(4)(b) and OAC rule 3745-114-01, 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 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified Permit to Install (PTI), 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 ton per year may require the permittee to apply for and obtain a new PTI.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. all exceedances of the rolling, 12-month emission limitation of 230.0 tons (for emissions units K001, K002, R006-R015, and R021, combined).
  - b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units K001, K002, R006-R015, and R021, combined).
  - c. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.



These reports shall be submitted in accordance with the reporting requirements of the standard terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0106239]

- (2) 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.

[OAC rule 3745-15-03(A)]

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: 9.10 lbs OC/hr, from coatings operations

Applicable Compliance Method: The hourly allowable OC emission limitation above represents the potential to emit for this emissions unit and was established by multiplying the maximum hourly coating usage rate (2.0 gallons per hour) by the maximum OC coating content (4.55 pounds of OC per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI #P0106239]

- b. Emission Limitation: 230.0 tons of OC per rolling, 12-month period, from coating and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined.

Applicable Compliance Method: Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in d)(1).

[OAC rule 3745-77-07(C)(1) and PTI #P0106239]

- c. Emission Limitation: 9.90 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emissions units K001, K002, R006-R015, and R021, combined]

Applicable Compliance Method: Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in d)(2).

[OAC rule 3745-77-07(C)(1) and PTI #P0106239]



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- d. Emission Limitation: The OC content of any cleanup material employed in this emissions unit shall not exceed 7.34 lbs OC/gallon.

Applicable Compliance Method: Compliance with the OC content limitation above shall be based upon the record keeping requirements specified in d)(1).

[OAC rule 3745-77-07(C)(1) and PTI #P0106239]

- (2) Formulation data of USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials.

g) Miscellaneous Requirements

- (1) None.

**16. R021, Ebrite 508 coating booth**

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

Ebrite 508 coating booth. Custom built spray booth with robotic application, baffles, and bag filters.

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

(1) b)(1)d. and d)(9).

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) (PTI #P0115160 issued September 9, 2013)	52.38 tons volatile organic compounds (VOC) per rolling, 12-month period from coating and cleanup operations  See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI #P0115160 issued September 9, 2013)	230.0 tons of VOC per rolling, 12-month period from the coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined  9.90 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs for emissions units K001, K002, R006-R015, and R021, combined  See b)(2)b.
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3)
d.	OAC rule 3745-114 ORC 3704.03(F)	See d)(9)

(2) Additional Terms and Conditions

- a. The BAT requirements under ORC rule 3704.03(T) have been determined to be compliance with the rolling, 12-month VOC emission limitation established under b)(1)a.
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding the applicability of Maximum Achievable Control Technology (MACT) regulations and maintains the facility as a minor source for attainment New Source Review:

230.0 tons of VOC per rolling, 12-month period from the coating and cleanup operations for emissions units K001, K002, R006-R015, and R021 combined based on a coating/cleanup usage restriction [See c)(1)].

Annual HAP emissions from emissions units K001, K002, R006-R015, and R021, combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

Federally enforceable VOC and HAP emission limitations were established in previously issued permits for emissions units K001, K002, R006-R015, and R021, and as such the facility has existing usage and VOC and HAP emissions records for the coating operations in lieu of establishing monthly restrictions for the first year of operation.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n [V_i G_i] \div \frac{2000 \text{ lbs}}{\text{ton}} \leq 230.0$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = OC content in pounds per gallon of each coating/cleanup employed;

G<sub>i</sub> = Gallons used of each coating and cleanup material for the rolling 12-month period

n = total number of unique coatings and cleanup materials employed in emission units K001, K002, R006-R015, and R021.

[OAC rule 3745-77-07(A)(1) and PTI #P0115160]

- (2) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee

[OAC rule 3745-77-07(A)(1) and PTI #P0115160]

- (3) In the event the particulate filter system and/or water wash is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and PTI #P0115160]

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

- (1) The permittee shall collect and record the following information each month for coating/cleanup material usage in this emissions unit:

- a. the name and identification number of each coating and cleanup material employed;
- b. the number of gallons of each coating and cleanup material employed;
- c. The VOC content of each coating and cleanup material employed, as applied, in lbs/gallon;
- d. the VOC emissions from each coating and cleanup material employed, in lbs [d)(1)b. x d)(1)c.];
- e. the total VOC emissions from all coatings and cleanup materials employed, in tons [summation of d)(1)d. x 1 ton/2000 lbs]; and
- f. the total annual VOC emissions, in tons, from all coatings and cleanup materials employed, based upon a rolling, 12-month summation [the summation of d)(1)e. per rolling, 12-month period].

[OAC rule 3745-77-07(C)(1) and PTI #P0115160]

- (2) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined:

- a. the name and identification number of each coating and cleanup material employed;
- b. the VOC content of each coating and cleanup material employed, as applied, in lbs/gallon;
- c. the number of gallons of each coating and cleanup material employed;

- d. the VOC emission rate for each coating and cleanup material employed, in lbs [d)(2)b. x d)(2)c.];
- e. the cumulative monthly VOC emission rate for all coatings and cleanup materials employed, in tons [summation of d)(2)d. x 1 ton/2000 lbs]; and
- f. the rolling, 12-month VOC emissions, for all coatings and cleanup materials, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #P0115160]

- (3) The permittee shall collect and record the following HAP information each month for emissions K001, K002, R006-R015, and R021, combined:

- a. the name and identification number of each coating and cleanup material employed;
- b. the amount of each individual HAP in each coating and cleanup material, as applied, in lbs/gallon;
- c. the number of gallons of each coating and cleanup material employed;
- d. the emission rate for each individual HAP from each coating and cleanup material employed [d)(3)b. x d)(3)c.] for each individual HAP, in lbs;
- e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed, in lbs [for each individual HAP, the summation of d)(3)d. for all coatings and cleanup materials];
- f. the total HAP emission rate for all HAPs, combined from all the coatings and cleanup materials employed, in tons [summation of d)(3)e. x 1 ton/2000 lbs for all HAPs for all coatings and cleanup materials]; and
- g. the rolling, 12-month emissions of each individual HAP and all HAPs, combined, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #P0115160]

- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter and water wash control, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0115160]

- (5) The permittee shall conduct periodic inspections of the dry particulate filter and water wash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the

permittee shall maintain a copy of the manufacturers recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0115160]

- (6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter and water wash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and PTI #P0115160]

- (7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and water wash control system and shall maintain the following information:
- a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and PTI #P0115160]

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter and/or water wash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter and/or water wash control was not operated according to the manufacturers recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and PTI #P0115160]

- (9) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b) and OAC rule 3745-114-01, 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 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified Permit to Install (PTI), 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 ton per year may require the permittee to apply for and obtain a new PTI.

[OAC rule 3745-77-07(C)(1) and PTI #P0115160]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the 52.38 tons VOC per rolling, 12-month period from coating and cleaning operations;
  - b. all exceedances of the rolling, 12-month emission limitation of 230.0 tons for emissions units K001, K002, R006-R015, and R021, combined;
  - c. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively for emissions units K001, K002, R006-R015, and R021, combined; and
  - d. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

These reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0115160]

- (2) 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.

[OAC rule 3745-15-03(A)]

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: 52.38 tons VOC per rolling, 12-month period from coating and cleanup operations

Applicable Compliance Method: Compliance with the limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0115160]



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**Facility ID:** 0370010058

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

- b. Emission Limitation: 230.0 tons of VOC per rolling, 12-month period, from coating and cleanup materials employed in emissions units K001, K002, R006-R015, and R021, combined.

Applicable Compliance Method: Compliance with the limitation above shall be based upon the record keeping requirements specified in d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0115160]

- c. Emission Limitations: 9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs for emission units K001, K002, R006-R015, and R021, combined

Applicable Compliance Method: Compliance with the limitations above shall be based upon the record keeping requirements specified in d)(3) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0115160]

- g) Miscellaneous Requirements

- (1) None.