Ohio Environmental Protection Agency

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

11/9/2016

Certified Mail

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

Robert Hendricks
Niles Manufacturing & Finishing Inc
465 WALNUT ST
NILES, OH 44446

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

Facility ID: 0278060693
Permit Number: P0121534
Permit Type: Renewal
County: Trumbull

Dear Permit Holder:

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

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

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

Sincerely,

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

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

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   Netting Determination

2. Source Description:

   Renewal FEPTIO for a miscellaneous metal paint coating line (K001).

3. Facility Emissions and Attainment Status:

   VOC: 64.0 tons per year
   Individual HAP: 9.0 tons per year
   Combined HAPs: 20.5 tons per year

   These are the new synthetic minor limits; therefore, this renewal must go draft.

   Trumbull county is in attainment for all criteria pollutants.

4. Source Emissions:

   This source emits VOCs and uses no HAP coatings. The facility requested a change in the sources limits (decreases) and also wanted the daily VOC limit to be changed to a monthly VOC limit.

5. Conclusion:

   The facility is taking a federally enforceable restriction on its VOC, individual HAP and combined HAPs emissions to stay below Title V requirements.

6. Please provide additional notes or comments as necessary:

   None

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

Pollutant	Tons Per Year
VOC	9.0

PUBLIC NOTICE

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

Draft Air Pollution Permit-to-Install and Operate Renewal
Niles Manufacturing & Finishing Inc
465 WALNUT ST,, NILES, OH 44446
ID#:P0121534
Date of Action: 11/9/2016
Permit Desc:Renewal FEPTIO for a paint coating line..
The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the ID # or: Kevin Fortune, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)963-1200

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Niles Manufacturing & Finishing Inc

Facility ID:	0278060693
Permit Number:	P0121534
Permit Type:	Renewal
Issued:	11/9/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Niles Manufacturing & Finishing Inc

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Authorization

Facility ID:	0278060693
Application Number(s):	A0055669
Permit Number:	P0121534
Permit Description:	Renewal FEPTIO for a paint coating line.
Permit Type:	Renewal
Permit Fee:	$0.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	11/9/2016
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance to:

Niles Manufacturing & Finishing Inc
465 WALNUT ST
NILES, OH 44446

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0121534
Permit Description: Renewal FEPTIO for a paint coating line.

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

Emissions Unit ID:	**K001**
Company Equipment ID:	E-coat line #1-tankB
Superseded Permit Number:	02-18388
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) B.2

2. Facility-wide Requirements:

   a) Applicable Emissions Limitations and/or Control Requirements

      (1) In accordance with OAC rule 3745-31-05(D)(1)(b), the permittee proposed the following restrictions to avoid Title V requirements:

         a. facility-wide volatile organic compound (VOC) emissions shall not exceed 64.0 tons per year, based upon a rolling, 12-month summation of VOC emissions;

         b. facility-wide emissions of each individual hazardous air pollutant (HAP) shall not exceed 9.0 tons per year, based upon a rolling, 12-month summation; and

         c. facility-wide emissions of total combined HAPs shall not exceed 20.5 tons per year, based upon a rolling, 12-month summation.

   b) Operational Restrictions

      (1) None.

   c) Monitoring and/or Recordkeeping Requirements:

      (1) The permittee shall maintain the following facility-wide information each month:

         a. the monthly VOC emissions, in tons per month;

         b. the rolling, 12-month summation of total VOC emissions, in tons;

         c. the monthly individual HAP emissions, in tons per month;

         d. the rolling, 12-month summation of individual HAP emissions, in tons;

         e. the monthly total combined HAP emissions, in tons per month; and

         f. the rolling, 12-month summation of total combined HAP emissions, in tons.

d) Reporting Requirements

(1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. facility-wide VOC emissions shall not exceed 64.0 tons per year, based upon a rolling, 12-month summation of VOC emissions;

ii. facility-wide emissions of each individual HAP shall not exceed 9.0 tons per year, based upon a rolling, 12-month summation; and

iii. facility-wide emissions of total combined HAP shall not exceed 20.5 tons per year, based upon a rolling, 12-month summation.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

e) Testing Requirements

(1) Compliance with the allowable emission limitations in B.2.a)(1) above shall be determined in accordance with the following methods:

a. Emission Limitation:

Facility-wide VOC emissions shall not exceed 64.0 tons per year, based upon a rolling, 12-month summation of VOC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in B.2.c)(1)b.

b. Emission Limitation:

Facility-wide emissions of each individual HAP shall not exceed 9.0 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in B.2.c)(1)d.

c. Emission Limitation:

Facility-wide emissions of total combined HAPs shall not exceed 20.5 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in B.2.c)(1)f.

3. The Ohio EPA has determined that this facility may be subject to the requirements of a federal rule that Ohio EPA does not have the delegated authority to implement. Specifically:

a) On January 9, 2008, U.S. EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR Part 63, Subpart HHHHHH. Spray applications using coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) and paint stripping operations using methylene chloride must be operated in compliance with this federal rule; and/or

b) On July 23, 2008, U.S.EPA promulgated the NESHAP for Nine Metal Fabrication and Finishing Source Categories at Area Sources, 40 CFR Part 63, Subpart XXXXXX. Metal fabrication of finishing metals containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) must be operated in compliance with this federal rule.

Although Ohio EPA has determined that one or both of these federal rules (also known as a GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

C. Emissions Unit Terms and Conditions

1. K001, E-coat line #1-tankB

Operations, Property and/or Equipment Description:

electrodeposition tank with a bake oven E-coat line no. 1- Tank B

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

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

a. b)(1)e and d)(3)

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

a. B.2, b)(1)b and c)(2)

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)	Volatile organic compound (VOC) content shall not exceed 0.24 pound of VOC per gallon of coating, excluding water and exempt solvent(s), on a daily volume-weighted average. VOC emissions from the coatings employed in this emissions unit shall not exceed 0.75 ton per month averaged over a 12-month rolling period.
b.	OAC rule 3745-31-05(D)(1)(b)	VOC emissions shall not exceed 9.0 tons per year, based upon a rolling, 12-month summation. See B.2 and c)(2).
c.	OAC rule 3745-17-11(C)	Exempt. See b)(2)a.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-21-09(U)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	ORC 3704.03(F)(4)	See d)(3).

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the particulate control requirements in OAC rule 3745-17-11(C) if the miscellaneous metal coating line meets any one of the following criteria:

i. surface coating processes that apply only dip coatings, roll coatings, flow coatings, or brush coatings; or

ii. surface coating processes (e.g., for sealers, adhesives, and deadeners) that employ airless spray and bead-type (extrusion) application methods.

c) Operational Restrictions

(1) The permittee shall use only hazardous air pollutants (HAPs) free coatings in this emissions unit.

(2) The permittee shall not use more than 75,000 gallons of coatings per rolling, 12-month period.

d) Monitoring and/or Recordkeeping Requirements

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

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

b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;

c. the daily volume-weighted average VOC content of all coatings used, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2; and

d. for any coatings used, whether or not the coatings contain any HAPs.

(2) The permittee shall collect, record and calculate the following information monthly for this emissions unit:

a. the name and identification number of each coating used;

b. the VOC content (excluding water and exempt solvents), in pounds per gallon, of each coating;

c. the total number of gallons (excluding water and exempt solvents) of each coating used for the month;

d. the total monthly VOC emissions from this line, i.e., the summation of d)(2)b times d)(2)c for all coatings employed; and

e. the rolling, 12-month summation of the coating usage in gallons each month.

(3) 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 FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

(1) 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 Northeast 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 signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

(3) The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing that the daily volume-weighted average VOC content(s) exceeded the applicable limitation(s). The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days after the exceedance occurs.

(4) The permittee shall notify the Ohio EPA Northeast District Office in writing of any record for this line showing that the average daily VOC emissions exceeded the applicable limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days after the exceedance occurs.

(5) The permittee shall notify the Ohio EPA Northeast District Office in writing of any record for this line showing that HAP-containing coatings were employed. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days after the exceedance occurs.

(6) The permittee shall notify the Ohio EPA Northeast District Office in writing of any record for this line showing exceedances of the rolling, 12-month coating usage limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days after the exceedance occurs.

f) Testing Requirements

(1) Compliance with the emissions limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

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

VOC content shall not exceed 0.24 pound of VOC per gallon of coating, excluding water and exempt solvent(s), on a daily volume-weighted average.

<u>Applicable Compliance Method</u>:

Compliance with the coating content limitation shall be demonstrated based upon the record keeping requirements specified in d)(1). Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of all coatings and cleaning materials.

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

VOC emissions from the coatings employed in this emissions unit shall not exceed 0.75 ton per month averaged over a 12-month rolling period.

<u>Applicable Compliance Method</u>:

Compliance shall be demonstrated based upon the record keeping requirement specified in d)(2)d divided by 2000 lbs/ton.

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

VOC emissions shall not exceed 9.0 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in d)(2)d summed for the year and then divided by 2000 lbs/ton.

g) Miscellaneous Requirements

(1) None.