



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

9/8/2008

Adam Chenevey  
The Gerstenslager Company  
1425 E. Bowman Street  
P.O. BOX 6011  
Wooster, OH 44691-6011

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0285030253  
Permit Number: P0086536  
Permit Type: Renewal  
County: Wayne

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate 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 comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Daily Recorder. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. 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  
122 South Front Street  
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 43087

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 in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate 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 and Operate 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)425-9171.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

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

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director



**FEDERALLY ENFORCEABLE STATE OPERATING PERMITS  
SYNTHETIC MINOR DETERMINATION**

The Gerstenslager Company  
02-85-03-0253

**A. Source Description**

The Gerstenslager Company is a manufacturer of after-market auto body parts, SIC 3465. The facility is located in Wooster, Wayne County. Wayne County is attainment for all criteria pollutants.

**B. Facility Emissions and Attainment Status**

The facility is a major source according to Title V for VOC and a minor source for all other pollutants.

The Gerstenslager Company operates an e-coat line, K003, and five solvent die cleaning operations, L001, P001, P002, P003 and P004 .

Listed below is a chart of the potential emissions from each emissions unit and the facility:

Pollutant	K003	L001	P001	P002	P003	P004	Other	Sum
VOC	98.05	3.60	9.0	9.0	15.0	9.0	13.54	157.19
PM 10	0.65	0	0.01	0.01	0	0.01	3.44	4.12
SO2	0.01	0	0	0	0	0	0.02	0.05
NOx	8.50	0	0.13	0.15	0	0.15	32.92	41.86
CO	7.14	0	0.11	0.13	0	0.13	27.85	35.36

**C. Emission Limitations**

By limiting the total VOC emissions from K003 to 35.0 as a rolling, 12-month summation, this permit limits the facility-wide potential VOC emissions to 94.28 tons per rolling, 12-month period. The facility is required to keep rolling-12-month VOC emission records for K003 and report deviations of the limitation quarterly

Pollutant	K003	L001	P001	P002	P003	P004	Other	Sum
VOC	35.0	3.60	9.0	9.0	15.0	9.0	13.68	94.28

**D. Conclusion**

The emission limits contained in these FESOPs are adequate to provide federally enforceable limitations for VOC and thus ensures that the applicable Title V thresholds will not be exceeded.



PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
The Gerstenslager Company

Issue Date: 9/8/2008  
Permit Number: P0086536  
Permit Type: Renewal  
Permit Description: FE PTIO to release the facility from Title V obligations  
Facility ID: 0285030253  
Facility Location: The Gerstenslager Company  
1425 E. Bowman Street,  
Wooster, OH 44691-6011  
Facility Description: Motor Vehicle Metal Stamping

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Amysue O'Reilly at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road or (330)425-9171. The permit can be downloaded from the Web page: [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc)





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**DRAFT**

**Air Pollution Permit-to-Install and Operate**  
for  
The Gerstenslager Company

Facility ID: 0285030253  
Permit Number: P0086536  
Permit Type: Renewal  
Issued: 9/8/2008  
Effective: To be entered upon final issuance  
Expiration: To be entered upon final issuance





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Air Pollution Permit-to-Install and Operate**  
for  
The Gerstenslager Company

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0086536

**Facility ID:** 0285030253

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

# Authorization

Facility ID: 0285030253  
Application Number(s): A0017291  
Permit Number: P0086536  
Permit Description: FE PTIO to release the facility from Title V obligations  
Permit Type: Renewal  
Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*  
Issue Date: 9/8/2008  
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:

The Gerstenslager Company  
1425 E. Bowman Street  
Wooster, OH 44691-6011

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

Ohio 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 43087  
(330)425-9171

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

Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0086536

Permit Description: FE PTIO to release the facility from Title V obligations

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

**Emissions Unit ID:**

Company Equipment ID:  
Superseded Permit Number:  
General Permit Category and Type:

**K003**

E-COAT LINE

Not Applicable

**Emissions Unit ID:**

Company Equipment ID:  
Superseded Permit Number:  
General Permit Category and Type:

**L001**

IN PRESS DIE WASHING

Not Applicable

**Emissions Unit ID:**

Company Equipment ID:  
Superseded Permit Number:  
General Permit Category and Type:

**P001**

DIE WASHING STATION #1

Not Applicable

**Emissions Unit ID:**

Company Equipment ID:  
Superseded Permit Number:  
General Permit Category and Type:

**P002**

DIE WASHING STATION #2

Not Applicable

**Emissions Unit ID:**

Company Equipment ID:  
Superseded Permit Number:  
General Permit Category and Type:

**P003**

FLAW HIGHLIGHTING

Not Applicable

**Emissions Unit ID:**

Company Equipment ID:  
Superseded Permit Number:  
General Permit Category and Type:

**P004**

DIE WASHING STATION #3

Not Applicable



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0086536

**Facility ID:** 0285030253

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

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



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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

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



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

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0086536

**Facility ID:** 0285030253

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

**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.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

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**Facility ID:** 0285030253

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

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0086536

**Facility ID:** 0285030253

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

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0086536

**Facility ID:** 0285030253

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

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



**1. K003, E-COAT LINE**

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

E-coat line

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

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

a. None.

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

a. b)(1)b

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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 3745-21-09(U)(1)(i)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 3.0 pounds of VOC emissions per gallon of coating, excluding water and exempt solvents, on a daily volume-weighted average.
b.	OAC rule 3745-31-05(D)	See b)(2)a and c)(1).

(2) Additional Terms and Conditions

a. The VOC emissions from all coatings, cleanup materials and part curing shall not exceed 35.0 tons per year, based upon a rolling, 12-month summation.

c) Operational Restrictions

(1) The maximum coating, and clean up material VOC usage for this emissions unit shall not exceed 35 tons of VOC per rolling, 12-months.



This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating VOC usage, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the line in order to determine compliance with the coating VOC content limitation:
  - a. the name and identification number of each coating, as applied;
  - b. the VOC content (excluding water and exempt solvents) and the volume of each coating (excluding water and exempt solvents), as applied; and
  - c. the monthly volume-weighted average VOC content of all coatings, as applied (excluding water and exempt solvents), calculated in accordance with the equation specified in f)(1)a.
- (2) The permittee shall collect and record the following information each month for the line in order to determine compliance with the annual VOC limitation from the line:
  - a. the name and identification number of each coating and clean-up material, as applied;
  - b. the mass of VOC per volume, including cure volatiles, and the volume of each coating and clean-up material;
  - c. the total VOC emissions from coatings and clean-up materials, in pounds, including cure volatiles; and
  - d. the total VOC emissions, coating and cure, from this emissions unit, in pounds or tons per month, and the total VOC emissions for the previous, 12-month period, in tons.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 45 days after the exceedance occurs.
- (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. identify any exceedance of the rolling, 12-month VOC emission limitation.
  - b. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and



- c. the magnitude and duration of each deviation (excursion).

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

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:

VOC emissions from this emissions unit shall not exceed 3.0 pounds VOC per gallon of coating employed, excluding water and exempt solvent.

Applicable Compliance Method:

Compliance shall be demonstrated based on the monthly record keeping requirement specified in d)(1) and the calculation in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

- b. Emissions Limitation:

VOC emissions shall not exceed 35.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based on the monthly record keeping requirement specified in d)(2).

- (2) Any determination of VOC content, solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0086536

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g) Miscellaneous Requirements

(1) None.



**2. L001, IN PRESS DIE WASHING**

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

In Press Die Washing

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

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

a. None.

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

a. b)(1)a. below.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	See b)(2)a and c)(1) below.
b.	OAC rule 3745-21-07(G)	This facility is not in a "Priority I" county; therefore, the requirements of this applicable rule do not apply to this emissions unit, per OAC rule 3745-21-07(A)(1).

(2) Additional Terms and Conditions

a. The VOC emissions from all solvents shall not exceed 3.6 tons per year, based upon a rolling, 12-month summation. The VOC content of each solvent shall not exceed 7.0 pounds per gallon.

c) Operational Restrictions

(1) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit. The maximum annual solvent usage for this emissions unit shall not exceed 1020 gallons, based upon a rolling, 12-month summation of the solvent usage figures.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the gallons of solvent usage for each month;
  - b. the VOC content of the solvent, in pounds per gallon; and
  - c. the rolling, 12-month summation of the coating usage, in gallons.
- (2) The permittee shall record the total annual VOC emissions from this emissions unit, (i.e., d)(1)c times d)(1)b divided by 2000 lbs/ton).

e) Reporting Requirements

- (1) 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. all exceedances of the rolling, 12-month solvent usage limitation.
  - b. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - c. the magnitude and duration of each deviation (excursion).

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

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emissions Limitation:

VOC emissions shall not exceed 7.0 pounds of VOC per gallon of solvent.



Applicable Compliance Method:

Compliance shall be demonstrated based on the monthly record keeping requirement specified in d)(1)b.

b. Emissions Limitation:

VOC emissions shall not exceed 3.6 tons per year from all solvents, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in d)(2) which is based on the record keeping requirements specified in d)(1).

- (2) Any determination of VOC content, solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24. Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

g) Miscellaneous Requirements

- (1) None.



3. P001, DIE WASHING STATION #1

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

Die Washing Station #1

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

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

a. None.

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

a. b)(1)c

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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 02-11063 - effective 9/3/97)	See b)(2)a and b)(2)b below.
b.	OAC rule 3745-21-07(G)	See b)(2)b below.
c.	OAC rule 3745-31-05(D)	See b)(2)a and c)(1) below.

(2) Additional Terms and Conditions

a. The volatile organic compound (VOC) emissions shall not exceed 49.2 pounds per day, as a monthly average, and 9.0 tons per year, as a rolling, 12-month summation.

b. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), is prohibited

The prohibition on the use of photochemically reactive materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in d)(2) and e)(2) shall be void.



c) Operational Restrictions

- (1) The maximum solvent material usage for this emissions unit, shall not cause emissions to exceed 9.0 tons of VOC per rolling, 12-months, calculated by the multiplying the VOC content of the solvent, in pounds per gallon, times the total solvent usage, in gallons per 12-month period.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the gallons of solvent usage for each month;
  - b. the VOC content of the solvent, in pounds per gallon;
  - c. the number of days in the month that the emissions unit was in operation
  - d. the total VOC emissions for the month, in pounds, i.e., a. times b.;
  - e. the calculated average, daily VOC emissions, in pounds, i.e., d. divided by c.; and
  - f. the total VOC emissions during the previous, 12-month period, i.e., summation of e. for the previous 12 months divided by 2000 lbs/ton.
- (2) The permittee shall record each month whether the material employed is a photochemically reactive material.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, d)(2) will be voided entirely.]

e) Reporting Requirements

- (1) 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. all exceedances of the rolling, 12-month VOC emission limitation.
  - b. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - c. the magnitude and duration of each deviation (excursion).

The quarterly reports shall be submitted (postmarked) each year by the 31st of January (covering October to December), the 30th of April (covering January to March), the 31st of July (covering April to June), and the 31st of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).



- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

- VOC emissions shall not exceed 49.2 pounds per day.

- Applicable Compliance Method:

- Compliance shall be demonstrated based on the record keeping requirement specified in d)(1)e.

- b. Emission Limitation:

- VOC emissions shall not exceed 9.0 tons per rolling, 12-month period.

- Applicable Compliance Method:

- Compliance shall be demonstrated based on the record keeping requirement specified in d)(1)f.

- (2) Any determination of VOC content, solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24. Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

g) Miscellaneous Requirements

- (1) None.



**4. P002, DIE WASHING STATION #2**

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

Die Washing Station #2

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

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

a. None.

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

a. b)(1)c

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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 02-11063 - effective 9/3/97)	See b)(2)a and b)(2)b below.
b.	OAC rule 3745-21-07(G)	See b)(2)b below.
c.	OAC rule 3745-31-05(D)	See b)(2)a and c)(1) below.

(2) Additional Terms and Conditions

a. The volatile organic compound (VOC) emissions shall not exceed 49.2 pounds per day, as a monthly average, and 9.0 tons per year, as a rolling, 12-month summation.

b. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

The prohibition on the use of photochemically reactive materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission



limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in d)(2) shall be void.

c) Operational Restrictions

- (1) The maximum solvent material usage for this emissions unit, shall not cause emissions to exceed 9.0 tons of VOC per rolling, 12-months, calculated by the multiplying the VOC content of the solvent, in pounds per gallon, times the total solvent usage, in gallons per 12-month period.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the gallons of solvent usage for each month;
  - b. the VOC content of the solvent, in pounds per gallon;
  - c. the number of days in the month that the emissions unit was in operation;
  - d. the total VOC emissions for the month, in pounds, i.e., a. times b.;
  - e. the calculated average, daily VOC emissions, in pounds, i.e., d. divided by c.; and
  - f. the total VOC emissions during the previous, 12-month period, i.e., summation of e. for the previous 12 months divided by 2000 lbs/ton.
- (2) The permittee shall record each month whether the material employed is a photochemically reactive material.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, d)(2) will be voided entirely.]

e) Reporting Requirements

- (1) 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. all exceedances of the rolling, 12-month VOC emission limitation.
  - b. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - c. the magnitude and duration of each deviation (excursion).

The quarterly reports shall be submitted (postmarked) each year by the 31st of January (covering October to December), the 30th of April (covering January to March), the 31st of July (covering April to June), and the 31st of October (covering July to September),



unless an alternative schedule has been established and approved by the Director (the Ohio EPA Northeast District Office).

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

VOC emissions shall not exceed 49.2 pounds day

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in d)(1)e.

- b. Emission Limitation:

VOC emissions shall not exceed 9.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in d)(1)f.

- (2) Any determination of VOC content, solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24. Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

g) Miscellaneous Requirements

- (1) None.



**5. P003, FLAW HIGHLIGHTING**

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

Flaw Highlighting

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

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

a. None.

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

a. b)(1)a

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	See b)(2)a, b)(2)b and c)(1) below.
b.	OAC rule 3745-21-07(G)	This facility is not in a "Priority I" county; therefore, the requirements of this applicable rule do not apply to this emissions unit, per OAC rule 3745-21-07(A)(1).

(2) Additional Terms and Conditions

a. The VOC emissions from all solvents shall not exceed 15.0 tons per year, based upon a rolling, 12-month summation.

b. The VOC content of each solvent shall not exceed 7.0 pounds per gallon.

c) Operational Restrictions

(1) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit. The maximum annual solvent usage for this



emissions unit shall not exceed 4285 gallons, based upon a rolling, 12-month summation of the solvent usage figures.

d) Monitoring and/or Recordkeeping Requirements

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

- a. the gallons of solvent usage for each month;
- b. the VOC content of the solvent, in pounds per gallon; and
- c. the rolling, 12-month summation of the coating usage, in gallons.

(2) The permittee shall record the total annual VOC emissions from this emissions unit, (i.e., d)(1)c times d)(1)b divided by 2000 lbs/ton).

e) Reporting Requirements

(1) 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. all exceedances of the rolling, 12-month VOC emission limitation.
- b. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- c. the magnitude and duration of each deviation (excursion).

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

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the allowable emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

VOC content shall not exceed 7.0 pounds per gallon of solvent.



Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in d)(1)b.

b. Emission Limitation:

VOC emissions shall not exceed 15.0 tons per year from all solvents, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirement specified in d)(2) which is based on the record keeping requirements specified in d)(1).

- (2) Any determination of VOC content, solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24. Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

g) Miscellaneous Requirements

- (1) None.



**6. P004, DIE WASHING STATION #3**

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

Die washing station No.3

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

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

a. None.

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

a. b)(1)c

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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 02-13583 as modified 3/15/01)	See b)(2)a and b)(2)b below.
b.	OAC rule 3745-21-07(G)	See b)(2)b below.
c.	OAC rule 3745-31-05(D)	See b)(2)a and c)(1) below.

(2) Additional Terms and Conditions

a. The volatile organic compound (VOC) emissions shall not exceed 49.3 pounds per day, as a monthly average, and 9.0 tons per year, as a rolling, 12-month summation.

b. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), is prohibited.

The prohibition on the use of photochemically reactive materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission



limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in C.2 and D.2 shall be void.

c) Operational Restrictions

- (1) The maximum solvent material usage for this emissions unit, shall not cause emissions to exceed 9.0 tons of VOC per rolling, 12-months, calculated by the multiplying the VOC content of the solvent, in pounds per gallon, times the total solvent usage, in gallons per 12-month period.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the gallons of solvent usage for each month;
  - b. the VOC content of the solvent, in pounds per gallon;
  - c. the number of days in the month that the emissions unit was in operation;
  - d. the total VOC emissions for the month, in pounds, i.e., a. times b.;
  - e. the calculated average, daily VOC emissions, in pounds, i.e., d. divided by c.; and
  - f. the total VOC emissions during the previous, 12-month period, i.e., summation of e. for the previous 12 months divided by 2000 lbs/ton.
- (2) The permittee shall record each month whether the material employed is a photochemically reactive material.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, d)(2) will be voided entirely.]

e) Reporting Requirements

- (1) 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. all exceedances of the rolling, 12-month VOC emission limitation.
  - b. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - c. the magnitude and duration of each deviation (excursion).

The quarterly reports shall be submitted (postmarked) each year by the 31st of January (covering October to December), the 30th of April (covering January to March), the 31st of July (covering April to June), and the 31st of October (covering July to September),



unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

- VOC emissions shall not exceed 49.3 pounds per day

- Applicable Compliance Method:

- Compliance shall be demonstrated based on the record keeping requirement specified in d)(1)e.

- b. Emission Limitation:

- VOC emissions shall not exceed 9.0 tons per rolling, 12-month period.

- Applicable Compliance Method:

- Compliance shall be demonstrated based on the record keeping requirement specified in d)(1)f.

- (2) Any determination of VOC content, solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24. Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

g) Miscellaneous Requirements

- (1) None.