State of Ohio Environmental Protection Agency

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9/29/2008

Certified Mail
Facility ID: 1318005887
Permit Number: P0094484
County: Cuyahoga

MIKE OLDERMAN
Robin Industries Cleveland Manufacturing Division
1265 WEST 65'TH STREET
CLEVELAND, OH 44102

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 2/12/2008. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit has been posted to the Division of Air Pollution Control (DAPC) 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 permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
Columbus, Ohio 43215

and

Cleveland Division of Air Quality
Penton Media Building, 4th Floor
1300 East 9th Street
Cleveland, OH 44114

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Cleveland Division of Air Quality

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

PRELIMINARY PROPOSED

Air Pollution Title V Permit

for

Robin Industries Cleveland Manufacturing Division

Facility ID: 1318005887
Permit Number: P0094484
Permit Type: Renewal
Issued: 9/29/2008
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 Title V Permit
for
Robin Industries Cleveland Manufacturing Division

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Authorization

Facility ID: 1318005887
Facility Description: Fabricates rubber automotive parts. Facility was formerly known as Cleveland Manufacturing Division.
Application Number(s): A0025998, A0025999, A0026000
Permit Number: P0094484
Permit Description: Title V Renewal Permit
Permit Type: Renewal
Issue Date: 9/29/2008
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number:

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

Robin Industries Cleveland Manufacturing Division
1265 WEST 65'TH STREET
CLEVELAND, OH 44102

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
Penton Media Building, 4th Floor
1300 East 9th Street
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Cleveland Division of Air Quality. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

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

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

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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

See A.29 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

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

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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

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

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

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Cleveland Division of Air Quality.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

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

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

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

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

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

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

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the

Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

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

soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

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

17. Off-Permit Changes

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

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

18. Compliance Method Requirements

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

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

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

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

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

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

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

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

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

25. Records Retention Requirements Under State Law Only

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

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.
(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting

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

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.
(Authority for term: OAC rule 3745-77-01(C))

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

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

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

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

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

   a) 5.

2. The permittee is currently subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) in accordance with 40 CFR Parts 63.3880 - 63.3981 including the Table(s) and Appendix(ices) referenced in Subpart MMMM hereto, and are hereby incorporated into this permit as if fully written.

   The following emissions units are subject to 40 CFR Part 63, Subpart MMMM:

   K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, and K014.

   [Authority for term: 40 CFR Part 63, Subpart MMMM]

3. The permittee is subject to the following requirements specified in 40 CFR Part 63, Subpart A as listed in Appendix C of 40 CFR Part 63, Subpart T: Parts 63.1(a)(1)-(3), 63.1(a)(4), 63.1(a)(6)-(8), 63.1(a)(10), 63.1(a)(12)-(14), 63.1(b)(2), 63.1(c)(1), 63.1(c)(2), 63.1(c)(4), 63.1(c)(5), 63.1(e), 63.2, 63.3(a)-(c), 63.4(a)(1)-(3), 63.4(a)(5), 63.4(b)-(c), 63.5(a)(1), 63.5(a)(2), 63.5(b)(1), 63.5(b)(4)-(6), 63.6(a), 63.6(b)(1)-(5), 63.6(c)(1)-(2), 63.6(c)(5), 63.6(e)(1)-(2), 63.6(f)-(g), 63.6(i)(1)-(14), 63.6(i)(16), 63.6(j), 63.7(a), 63.7(b), 63.7(c)(1), 63.7(e), 63.7(f), 63.7(g), 63.8(a)-(b), 63.8(f), 63.9(a)(1)-(4), 63.9(b)(1), 63.9(b)(2), 63.9(b)(3), 63.9(b)(5), 63.9(c), 63.9(d), 63.9(e), 63.9(i), 63.9(j), 63.10(a), 63.10(d)(1), 63.10(f), 63.11(a), 63.12(a)-(c), 63.13(a)-(c) and 63.15(a)-(b).

   The following emissions unit is subject to the aforementioned requirements: L001.

   [Authority for term: 40 CFR Part 63, Subpart A]

4. The following insignificant emissions units are located at this facility:

   B002 - east boiler (permit to install 13-2389);
   B003 - west boiler (permit to install 13-2389);
   Z003 - bead blaster;
   Z007 - post cure oven #1; and
   Z055 - parts and equipment cleanup materials.*

   *Cleanup material includes n-propyl bromide (Product name: EnSolv - GCS). Conservative estimates of facility wide cleanup emissions do not exceed 1.65 tons per year.

   Each insignificant emissions unit at the facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

   [Authority for term: OAC rule 3745-77-07(A)(13)]

5. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Z001 - extruder #1;
Z004 - grit blaster #1;
Z005 - grit blaster #2;
Z006 - outer blaster;
Z009 - mill #1;
Z010 - mill #2;
Z011 - mill #3;
Z013 - press 1801;
Z014 - press 1802;
Z015 - press 1803;
Z016 - press 1804;
Z017 - press 1805;
Z018 - press 1806;
Z019 - press 1807;
Z020 - press 1808;
Z021 - press 1809;
Z022 - press 1810;
Z023 - press 1811;
Z024 - press 1812;
Z025 - press 1813;
Z026 - press 1814;
Z027 - press 1815;
Z028 - press 1816;
Z029 - press 1817;
Z030 - press 1818;
Z031 - press 2401;
Z032 - press 2402;
Z033 - press 2403;
Z034 - press 2404;
Z035 - press 2405;
Z036 - press 2406;
Z037 - press 3201;
Z038 - press 3202;
Z039 - press 3203;
Z040 - press 3204;
Z041 - press 3205;
Z042 - press 3206;
Z043 - press 3207;
Z044 - press 3208;
Z045 - press 3209;
Z047 - press 4501;

Z048 - press 4502;
Z049 - press 4503;
Z050 - press 4504;
Z051 - injection Press 1;
Z053 - cold feed extruder; and
Z054 - Hill Clark grinder.

C. Emissions Unit Terms and Conditions

1. K001, DIP DRUM

Operations, Property and/or Equipment Description:

A DIP DRUM FOR COATING METAL PARTS WITH ADHESIVE consisting of 1 cement 55-gallon drum, 1 exhaust booth, and 1 steam heated drying oven

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

(1) None.

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 #13-04237, issued 9/30/04)	Volatile organic compound (VOC) emissions shall not exceed 19.8 pounds per day and 3.61 tons per year. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart MMMM.
b.	40 CFR Part 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products	See b)(2)a – b)(2)d below.
c.	OAC rule 3745-21-09(U)(2)(e)(ii)	See c)(1) below.

(2) Additional Terms and Conditions

a. The limit for an existing rubber to metal coating affected source in 40 CFR 63.3890(b)(4) is 4.5 kg organic HAP/liter of coating solids (or 37.7 lbs organic HAP/gal coating solids) used during each rolling, 12-month period.

[Authority for term: 40 CFR Part 63, Subpart MMMM and PTI #13-04237]

b. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

The final rules found in 40 CFR Part 63, Subpart MMMM establish national emission standards for hazardous air pollutants (NESHAP), work practice standards, and compliance requirements for miscellaneous metal parts coating operations.

The affected sources include the coating operations; all manual and automated equipment and containers/vessels used for conveying, storing, and mixing coatings, thinners, additives, purge, and cleaning materials; all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee shall become subject to the requirements and limitations of this NESHAP on January 2, 2007, at which time the initial compliance period begins for the coating operations. The initial compliance period ends on the last day of the 12th month following the compliance date.

[Authority for term: 40 CFR 63.3882(b) and 63.3883]

c. The permittee shall determine the method of compliance for each coating line and/or coating operation subject to 40 CFR Part 63, Subpart MMMM. The determination of the selected compliance method(s) shall be submitted in writing to the Cleveland Division of Air Quality (CDAQ) and at least 30 days before the compliance date. The appropriate compliance methods and record keeping requirements for each emissions unit subject to this NESHAP shall be implemented starting on the compliance date, January 2, 2007.

[Authority for term: 40 CFR 63.3883(d)]

d. For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.3890 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month on a rolling, 12-month basis.

[Authority for term: 40 CFR 63.3900(a)]

c) Operational Restrictions

(1) The permittee shall employ no more than 3 gallons of coatings in any one day for this emissions unit.

[Authority for term: OAC rule 3745-21-09(U)(2)(e)(ii) and PTI #13-04237]

(2) If the permittee can meet the emission limitation(s) contained in 40 CFR 63.3890 without add-on controls, by calculating the rolling, 12-month HAP emission rate at the end of each month, the permittee shall not be required to meet the operating limits contained in 40 CFR 63.3892 or work practice standards contained in 40 CFR 63.3893.

[Authority for term: 40 CFR 63.3892(a) and 63.3893(a)]

(3) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit (including the associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the CDAQ, which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or other standard operating procedures), operation and maintenance records, and inspection of the facility.

[Authority for term: 40 CFR 63.6(e)(1)]

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 and identification number of each coating employed;

b. the amount, in gallons, of each coating employed;

c. the total amount, in gallons, of all coatings employed;

d. the VOC content of each coating, in pounds per gallon, as applied; and

e. the total VOC emissions from all coatings, in pounds [summation of (b x d) for all coatings].

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(B)(3)(d), and PTI #13-04237]

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

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the

miscellaneous metal parts coating operation(s), including information from the supplier or manufacturer, formulation data, and/or coating/material testing data;

b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:

i. Method 311 from 40 CFR Part 63, Appendix A;

ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP; or

iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pound HAP/gallon of material pounds/gallon of material, or calculated in kg/liter);

e. the volume fraction of coating solids (gallon of coating solids/gallon of coating or liter of coating solids/liter of coating) for each coating applied which can be calculated using one of the following methods:

i. divide the nonvolatile volume percent, obtained from either ASTM Method D2697-86 ("Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings") or Method D6093-97 ("Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer"), by 100 to convert percent to the volume fraction of coating solids; or

ii. calculated from: Vs = 1 - mvolatiles / Davg

where:

Vs is the volume fraction of coating solids, in gallon of coating solids/gallon of coating or liter of coating solids/liter of coating;

mvolatiles is the total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined in accordance to Method 24 in Appendix A of 40 CFR Part 60, in pound of volatile matter per gallon of coating or grams volatile matter per liter of coating;

Davg is the average density of volatile matter in the coating, i.e., pound of volatile matter per gallon of volatile matter or grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98 "Standard Test Method for Density of Liquid Coatings, Inks,

and Related Products" or from information provided by the supplier or manufacturer, or from reference sources providing density or specific gravity data for pure materials; or

iii. the volume fraction of coating solids can be calculated using information provided by the manufacturer, by using the following information to convert percent by weight to percent by volume, if not provided directly:

(a) for each coating, change the percent by weight solids, percent by weight water, and percent by weight total solvent to the same number of "pounds" or "kilograms" (by assuming 100 pounds {or kg} of coating is applied) and divide each component's assumed "weight" by its density in the coating, to get the gallons of solids, gallons of water, and gallons of solvent;

(b) add the gallons of solids, gallons of water, and gallons of solvent from (a); and

(c) divide the gallons of solids, from (a) by the sum of the gallons of coating components from (b), to get the volume fraction of coating solids (gallon of coating solids per gallon of coating or liter of coating solids per liter of coating).

f. the total mass of organic HAP (pound or kg) in all of the coatings, thinners/additives, and cleanup/purge materials (as purchased) applied during the month, calculated separately for coatings, thinners/additives, and cleanup/purge materials as follows:

HAP = summation of (VOLi) (Di) (Wi) for i = 1,

where:

HAP is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials used each month, in pound or kg of HAP for each: 1. the coatings (HAPc), 2. thinners/additives (HAPt), and 3. cleanup/purge materials (HAPcu).

VOLi is the volume of material "i" documented in d)(2)b. above, in gallons or liters.

Di is the density of material "i" as documented in d)(2)c. above, in pounds/gallon or kg/liter.

Wi is the mass fraction of organic HAP in material "i" as calculated in d)(2)d. above, in pound/pound or kg/kg.

r is the number of coatings, the number of thinners/additives, or the number of cleanup/purge materials used during the month, each source (coating, thinner/additive, cleanup/purge) calculated separately for its HAP.

g. the total mass of organic HAP emissions for each month, calculated as follows:

HAPTOT = HAPc + HAPt + HAPcu - Rw

where:

HAPTOT is the total mass of organic HAP emissions for the month, in pound or kg.

HAPc is the total mass of organic HAP emissions from all the coatings used during the month, summed from the total mass of HAP calculated from all the coatings applied, as required in d)(2)f. above, in pound or kg.

HAPt is the total mass of organic HAP emissions from all thinners/additives used during the month, summed from the total mass of HAP calculated from all the thinners/additives applied, as required in d)(2)f. above, in pound or kg.

HAPcu is the total mass of organic HAP emissions from all cleanup and purge materials used during the month, summed from the total mass of HAP calculated from all the cleanup/purge materials applied, as required in d)(2)f. above, in pound or kg.

Rw is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to Rw if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for disposal).

h. the total volume of coating solids applied during the month, calculated as follows:

VOLs = summation of (VOLh) (Vh) for h = 1, m

where

VOLs is the total volume of coating solids used during the month, in gallons or liters.

VOLh is the total volume of coating "h" used during the month, as documented in d)(2)b. above, in gallons or liters.

Vh is the volume fraction of coating solids for coating "h", in liter of solids per liter coating or gallon of solids per gallon of coating, calculated as required in d)(2)e. above.

m is the number of coatings applied during the month.

i. the total organic HAP emission rate for the 12-month compliance period, in pound of HAP per gallon of coating solids or kg of HAP per liter of coating solids applied during the rolling, 12-month compliance period, calculated as follows:

HAPcomply = [summation of (HAPTOT, y) for y = 1, 12] divided by [summation of (VOLs, y) for y = 1, 12]

HAPcomply is the total organic HAP emission rate for the 12-month compliance period, in pound organic HAP emitted per gallon of coating solids applied or kg organic HAP emitted per liter of coating solids applied.

HAPTOT, y is the total mass of organic HAP emissions from all materials used during month y, calculated in d)(2)g. above, in pound or kg.

VOLs, y is the total volume of coating solids used during month y, calculated in d)(2)h. above, in gallons or liters.

y is the identifier for the month; and

j. all calculations required by this permit for each rolling 12-month compliance period.

In order to demonstrate continuous compliance, the organic HAP emission rate for each rolling 12-month compliance period, must be less than or equal to the applicable emission limit in 40 CFR 63.3890. Following the initial compliance period (the 12th month following the compliance date), the compliance demonstration shall be conducted on a monthly basis using data and documentation from the previous 12 months of operation in the above calculations.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

[Authority for term: 40 CFR 63.3930, 63.3931, 63.3950, 63.3951, and 63.3952]

(3) The permittee shall also maintain the following records for the miscellaneous metal parts coating line:

A copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.3890 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

[Authority for terms: 40 CFR 63.3930(a) and 63.3931]

e) Reporting Requirements

(1) The permittee shall notify the CDAQ in writing of any daily record showing that this emissions unit employs more than 3 gallons of coating, as recorded in Section d)(1)c. This notification shall include a copy of such record and shall be sent to the CDAQ within 30 days* after the exceedance occurs.

*Note: the reporting frequency established pursuant to PTI #13-04237, issued 9/30/04 (within 30 days after the exceedance) is more stringent than the reporting frequency

established pursuant to OAC rule 3745-21-09(B)(3)(e) (within 45 days after the exceedance).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04237]

(2) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 or January 31 following the end of each semiannual reporting period (June 30 or December 31). The first semiannual compliance period shall begin the day after the end of the initial compliance period, as described in this permit. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of the compliance method as the "without add-on control" option;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period for the uncontrolled coating operations or the limitation from 40 CFR 63.3890 for each type of compliant coating applied;

g. if there were no deviations, a statement that there were no deviations from the emissions limitations during the reporting period; and

h. if there were any deviations during the compliance period, the report shall include the following information:

i. deviations from coating applications without add-on control shall include the following information:

(a) the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;

(b) the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

(c) if applicable, the calculation used to determine mass of organic HAP in waste materials; and

(d) a statement of the cause of each deviation.

[Authority for term: 40 CFR 63.3920(a)]

f) Testing Requirements

(1) Compliance with the emission limitation(s) in Section b)(1) of the terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

VOC emissions shall not exceed 19.8 pounds per day.

Applicable Compliance Method

Compliance shall be based upon the record keeping in d)(1). U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04237]

b. Emission Limitation:

VOC emissions shall not exceed 3.61 tons per year.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the daily VOC emission rate by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the lb/day limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04237]

c. Emission Limitation

The limit for an existing rubber to metal coating affected source in 40 CFR 63.3890(b)(4) is 4.5 kg organic HAP/liter of coating solids (or 37.7 lbs organic HAP/gal coating solids) used during each rolling, 12-month period.

Applicable Compliance Method

Compliance shall be based upon the record keeping and reporting in Sections d)(2) and e)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04237]

g) Miscellaneous Requirements

(1) None.

2. K006, BRUSH COATING NO.1

Operations, Property and/or Equipment Description:

A BRUSH COATING TABLE FOR COATING METAL PARTS WITH ADHESIVE

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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 #13-04237, issued 9/30/04)	Volatile organic compound (VOC) emissions shall not exceed 19.8 pounds per day and 3.61 tons per year. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart MMMM.
b.	40 CFR Part 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products	See b)(2)a – b)(2)d below.
c.	OAC rule 3745-21-09(U)(2)(e)(ii)	See c)(1) below.

(2) Additional Terms and Conditions

a. The limit for an existing rubber to metal coating affected source in 40 CFR 63.3890(b)(4) is 4.5 kg organic HAP/liter of coating solids (or 37.7 lbs organic HAP/gal coating solids) used during each rolling, 12-month period.

[Authority for term: 40 CFR Part 63, Subpart MMMM and PTI #13-04237]

b. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

The final rules found in 40 CFR Part 63, Subpart MMMM establish national emission standards for hazardous air pollutants (NESHAP), work practice

standards, and compliance requirements for miscellaneous metal parts coating operations.

The affected sources include the coating operations; all manual and automated equipment and containers/vessels used for conveying, storing, and mixing coatings, thinners, additives, purge, and cleaning materials; all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee shall become subject to the requirements and limitations of this NESHAP on January 2, 2007, at which time the initial compliance period begins for the coating operations. The initial compliance period ends on the last day of the 12th month following the compliance date.

[Authority for term: 40 CFR 63.3883 and 63.3882(b)]

c. The permittee shall determine the method of compliance for each coating line and/or coating operation subject to 40 CFR Part 63, Subpart MMMM. The determination of the selected compliance method(s) shall be submitted in writing to the Cleveland Division of Air Quality (CDAQ) and at least 30 days before the compliance date. The appropriate compliance methods and record keeping requirements for each emissions unit subject to this NESHAP shall be implemented starting on the compliance date, January 2, 2007.

[Authority for term: 40 CFR 63.3883(d)]

d. For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.3890 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month on a rolling, 12-month basis.

[Authority for term: 40 CFR 63.3900(a)]

c) Operational Restrictions

(1) The permittee shall employ no more than 3 gallons of coatings in any one day for this emissions unit.

[Authority for term: OAC rule 3745-21-09(U)(2)(e)(ii) and PTI #13-04237]

(2) If the permittee can meet the emission limitation(s) contained in 40 CFR 63.3890 without add-on controls, by calculating the rolling, 12-month HAP emission rate at the end of each month, the permittee shall not be required to meet the operating limits contained in 40 CFR 63.3892 or work practice standards contained in 40 CFR 63.3893.

[Authority for term: 40 CFR 63.3892(a) and 63.3893(a)]

(3) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit (including the associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the

greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the CDAQ, which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or other standard operating procedures), operation and maintenance records, and inspection of the facility.

[Authority for term: 40 CFR 63.6(e)(1)]

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 and identification number of each coating employed;

b. the amount, in gallons, of each coating employed;

c. the total amount, in gallons, of all coatings employed;

d. the VOC content of each coating, in pounds per gallon, as applied; and

e. the total VOC emissions from all coatings, in pounds [summation of (b x d) for all coatings].

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(B)(3)(d), and PTI #13-04237]

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

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the miscellaneous metal parts coating operation(s), including information from the supplier or manufacturer, formulation data, and/or coating/material testing data;

b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:

   i. Method 311 from 40 CFR Part 63, Appendix A;

   ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP; or

   iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pound HAP/gallon of material pounds/gallon of material, or calculated in kg/liter);

e. the volume fraction of coating solids (gallon of coating solids/gallon of coating or liter of coating solids/liter of coating) for each coating applied which can be calculated using one of the following methods:

   i. divide the nonvolatile volume percent, obtained from either ASTM Method D2697-86 ("Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings") or Method D6093-97 ("Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer"), by 100 to convert percent to the volume fraction of coating solids; or

   ii. calculated from: Vs = 1 - mvolatiles / Davg

   where

   Vs is the volume fraction of coating solids, in gallon of coating solids/gallon of coating or liter of coating solids/liter of coating;

   mvolatiles is the total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined in accordance to Method 24 in Appendix A of 40 CFR Part 60, in pound of volatile matter per gallon of coating or grams volatile matter per liter of coating;

   Davg is the average density of volatile matter in the coating, i.e., pound of volatile matter per gallon of volatile matter or grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98 "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" or from information provided by the supplier or manufacturer, or from reference sources providing density or specific gravity data for pure materials; or

   iii. the volume fraction of coating solids can be calculated using information provided by the manufacturer, by using the following information to convert percent by weight to percent by volume, if not provided directly:

(a) for each coating, change the percent by weight solids, percent by weight water, and percent by weight total solvent to the same number of "pounds" or "kilograms" (by assuming 100 pounds {or kg} of coating is applied) and divide each component's assumed "weight" by its density in the coating, to get the gallons of solids, gallons of water, and gallons of solvent;

(b) add the gallons of solids, gallons of water, and gallons of solvent from (a); and

(c) divide the gallons of solids, from (a) by the sum of the gallons of coating components from (b), to get the volume fraction of coating solids (gallon of coating solids per gallon of coating or liter of coating solids per liter of coating);

f. the total mass of organic HAP (pound or kg) in all of the coatings, thinners/additives, and cleanup/purge materials (as purchased) applied during the month, calculated separately for coatings, thinners/additives, and cleanup/purge materials as follows:

HAP = summation of (VOLi) (Di) (Wi) for i = 1, r

where:

HAP is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials used each month, in pound or kg of HAP for each: 1. the coatings (HAPc), 2. thinners/additives (HAPt), and 3. cleanup/purge materials (HAPcu).

VOLi is the volume of material "i" documented in d)(2)b. above, in gallons or liters.

Di is the density of material "i" as documented in d)(2)c. above, in pounds/gallon or kg/liter.

Wi is the mass fraction of organic HAP in material "i" as calculated in d)(2)d. above, in pound/pound or kg/kg.

r is the number of coatings, the number of thinners/additives, or the number of cleanup/purge materials used during the month, each source (coating, thinner/additive, cleanup/purge) calculated separately for its HAP.

g. the total mass of organic HAP emissions for each month, calculated as follows:

HAPTOT = HAPc + HAPt + HAPcu - Rw

where:

HAPTOT is the total mass of organic HAP emissions for the month, in pound or kg.

HAPc is the total mass of organic HAP emissions from all the coatings used during the month, summed from the total mass of HAP calculated from all the coatings applied, as required in d)(2)f. above, in pound or kg.

HAPt is the total mass of organic HAP emissions from all thinners/additives used during the month, summed from the total mass of HAP calculated from all the thinners/additives applied, as required in d)(2)f. above, in pound or kg.

HAPcu is the total mass of organic HAP emissions from all cleanup and purge materials used during the month, summed from the total mass of HAP calculated from all the cleanup/purge materials applied, as required in d)(2)f. above, in pound or kg.

Rw is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to Rw if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for disposal).

h. the total volume of coating solids applied during the month, calculated as follows:

VOLs = summation of (VOLh) (Vh) for h = 1, m

where:

VOLs is the total volume of coating solids used during the month, in gallons or liters.

VOLh is the total volume of coating "h" used during the month, as documented in d)(2)b. above, in gallons or liters.

Vh is the volume fraction of coating solids for coating "h", in liter of solids per liter coating or gallon of solids per gallon of coating, calculated as required in d)(2)e. above.

m is the number of coatings applied during the month.

i. the total organic HAP emission rate for the 12-month compliance period, in pound of HAP per gallon of coating solids or kg of HAP per liter of coating solids applied during the rolling, 12-month compliance period, calculated as follows:

HAPcomply = [summation of (HAPTOT, y) for y = 1, 12] divided by [summation of (VOLs, y) for y = 1,12]

HAPcomply is the total organic HAP emission rate for the 12-month compliance period, in pound organic HAP emitted per gallon of coating solids applied or kg organic HAP emitted per liter of coating solids applied.

HAPTOT, y is the total mass of organic HAP emissions from all materials used during month y, calculated in d)(2)g. above, in pound or kg.

VOLs, y is the total volume of coating solids used during month y, calculated in d)(2)h. above, in gallons or liters.

y is the identifier for the month; and

j. all calculations required by this permit for each rolling 12-month compliance period.

In order to demonstrate continuous compliance, the organic HAP emission rate for each rolling 12-month compliance period, must be less than or equal to the applicable emission limit in 40 CFR 63.3890. Following the initial compliance period (the 12th month following the compliance date), the compliance demonstration shall be conducted on a monthly basis using data and documentation from the previous 12 months of operation in the above calculations.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

[Authority for term: 40 CFR 63.3930, 63.3931, 63.3950, 63.3951, and 63.3952]

(3) The permittee shall also maintain the following records for the miscellaneous metal parts coating line:

A copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.3890 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

[Authority for term: 40 CFR 63.3930(a) and 63.3931]

e) Reporting Requirements

(1) The permittee shall notify the CDAQ in writing of any daily record showing that this emissions unit employs more than 3 gallons of coating, as recorded in Section d)(1)c. This notification shall include a copy of such record and shall be sent to the CDAQ within 30 days* after the exceedance occurs.

*Note: the reporting frequency established pursuant to PTI #13-04237, issued 9/30/04 (within 30 days after the exceedance) is more stringent than the reporting frequency established pursuant to OAC rule 3745-21-09(B)(3)(e) (within 45 days after the exceedance).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04237]

(2) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 or January 31 following the end of each semiannual reporting period (June 30 or December 31). The first semiannual compliance period shall begin the day after the end of the initial compliance period, as described in this permit. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of the compliance method as the "without add-on control" option;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period for the uncontrolled coating operations or the limitation from 40 CFR 63.3890 for each type of compliant coating applied;

g. if there were no deviations, a statement that there were no deviations from the emissions limitations during the reporting period; and

h. if there were any deviations during the compliance period, the report shall include the following information:

i. deviations from coating applications without add-on control shall include the following information:

the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;

the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

if applicable, the calculation used to determine mass of organic HAP in waste materials; and

a statement of the cause of each deviation

[Authority for term: 40 CFR 63.3920(a)]

f) Testing Requirements

(1) Compliance with the emission limitation(s) in Section b)(1) of the terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

VOC emissions shall not exceed 19.8 pounds per day.

Applicable Compliance Method

Compliance shall be based upon the record keeping in d)(1). U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04237]

(2) Emission Limitation:

VOC emissions shall not exceed 3.61 tons per year.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the daily VOC emission rate by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the lb/day limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04237]

(3) Emission Limitation

The limit for an existing rubber to metal coating affected source in 40 CFR 63.3890(b)(4) is 4.5 kg organic HAP/liter of coating solids (or 37.7 lbs organic HAP/gal coating solids) used during each rolling, 12-month period.

Applicable Compliance Method

Compliance shall be based upon the record keeping and reporting in d)(2) and e)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04237]

g) Miscellaneous Requirements

(1) None.

3. L001, DEGREASER

Operations, Property and/or Equipment Description:

AN OPEN TOP VAPOR DEGREASER FOR METAL CLEANING

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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.	40 CFR Part 63, Subpart T	See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-21-09(O)(6)(b)	This emissions unit is exempt from the requirements of OAC rules 3745-21-09(O)(2) through (O)(5). See b)(2)c. below.

(2) Additional Terms and Conditions

a. The permittee shall ensure that the chilled air blanket temperature (in degrees F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.

[OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart T]

b. The permittee shall comply with the following requirements and ensure the solvent cleaning machine conforms to the following design requirements:

i. ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures outlined in the "Monitoring and/or Record Keeping Requirements" section of this permit;

ii. establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less;

iii. the solvent cleaning machine shall have a freeboard ratio of 1.0 or greater;

iv. the solvent cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts;

v. the solvent cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils;

vi. the solvent cleaning machine shall be equipped with a vapor level control device that shuts off the sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser; and

vii. the solvent cleaning machine shall have a primary condenser.

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

c. The rule citation reflects the new exemption added to OAC rule 3745-21-09(O)(6)(b) for solvent metal cleaning operations subject to federal MACT standards under 40 CFR Part 63, Subpart T, provided the requirements of that Subpart T are specified in the terms and conditions. The revised rule containing the exemption was adopted by the Director of Ohio EPA in May 1999. The U.S. EPA has agreed to consider the rule citation as federally enforceable during the time from the effective date of this permit to the effective date of U.S. EPA approval of the rule citation as a revision to the Ohio SIP for VOC.

c) Operational Restrictions

(1) The parts baskets or the parts being cleaned in solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meter per minute (3 feet per minute) or less.

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

(2) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).

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

(3) Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Ohio EPA or Cleveland Division of Air Quality (CDAQ).

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

(4) Parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped.

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

(5) During startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater.

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

(6) During shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.

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

(7) When solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.

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

(8) The solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Ohio EPA or CDAQ to achieve the same or better results as those recommended by the manufacturer.

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

(9) The permittee shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in 40 CFR Part 63, Appendix B if requested during an inspection by the Ohio EPA or CDAQ.

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

(10) Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but must not allow liquid solvent to drain from the container.

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

(11) Sponges, fabric, wood, and paper products shall not be cleaned.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall monitor the hoist speed as described below:

a. the permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute);

b. the permittee shall conduct monthly monitoring of the hoist speed. If after the first year, no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly;

c. if an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated; and

d. if the permittee can demonstrate to the satisfaction of the Ohio EPA or Cleveland DAQ in the initial compliance report that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

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

(2) The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:

a. the types of solvents employed in the open top vapor degreaser;

b. all control equipment maintenance;

c. owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment;

d. the date of installation for the solvent cleaning machine and all of its control devices. If the exact date for the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted; and

e. records of the halogenated HAP solvent content for the solvent used in the solvent cleaning machine.

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

(3) The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent cleaning machine:

a. the results of control device monitoring required in this section of the permit;

b. information on the actions taken to comply with 40 CFR 63.463 (e) and (f), including records of written or verbal orders for replacement parts, a description of the repair made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels; and

c. estimates of annual perchloroethylene consumption for the solvent cleaning machine.

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

(4) The permittee shall conduct monitoring and record the results on a weekly basis for the freeboard refrigeration device by using a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.

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

(5) The permittee shall conduct quarterly monitoring of wind speed, and weekly monitoring of room parameters as specified below:

a. Measure the wind speed within 6 inches above the top of the freeboard area of the solvent cleaning machine as follows:

i. i. determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located;

ii. ii. orient a velometer in the direction of the wind current at each of the four corners of the machine;

iii. iii. record the reading for each corner; and

iv. iv. average the values obtained at each corner and record the average wind speed.

b. Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.

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

e) Reporting Requirements

(1) The permittee shall submit an annual report by February 1 of each year for the preceding year. Each annual report shall contain the following:

a. a signed statement from the facility owner or their designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required pursuant to 40 CFR 60.463 (d) (10);" and

b. an estimate of solvent consumption during the reporting period.

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

(2) The permittee shall submit an exceedance report on a semiannual basis. If the temperature of the chilled air blanket, measured at the center of the air blanket, was greater than 30% of the solvent's boiling point, and no correction was made within 15 days of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Ohio EPA or CDAQ. The permittee may receive approval of less frequent reporting if the following conditions are met: (1) The emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Ohio EPA or CDAQ does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e) (3) (iii) of subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:

a. The reason and a description of the exceedance and action(s) taken to comply with 40 CFR 63.463 (e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels.

b. If no exceedance has occurred, a statement to that effect shall be submitted.

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

f) Testing Requirements

(1) The permittee shall monitor the wind speed and room parameters using the following procedures:

a. Determine and measure the maximum wind speed within 6 inches above the top of the freeboard area of the solvent cleaning machine by slowly rotating a velometer or similar device until the maximum speed is located.

b. Orient the velometer or similar device in the direction of the wind current at each of the four corners of the machine and perform the following:

i. i. record the reading for each corner; and

ii. ii. average the values obtained at each corner and record the average wind speed.

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

(2) The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The potential to emit shall be determined in accordance with the following procedures:

a. Determine the potential to emit for each individual solvent cleaning machine using the following equation:

PTEi = Hi X Wi X SAIi

Where:

PTEi = the potential to emit for the solvent cleaning machine i (kgs solvent/year);

Hi = hours of operation for solvent cleaning machine i (hours per year);

= 8760 hrs/yr, unless otherwise restricted by a federally enforceable requirement;

Wi = the working mode uncontrolled emission rate (kgs/square meter per hour);

= 1.95 kgs/square meter per hour for batch vapor and cold cleaning machines;

= 1.12 kgs/square meter per hour for in-line cleaning machines; and

SAIi= solvent/air interface area of solvent cleaning machine i (square meters). Section 63.461 defines the solvent/air interface area for those machines that have a solvent /air interface. Cleaning machines that do not have a solvent area interface shall calculate a solvent/air interface area using the procedure in paragraph (b) below.

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

b. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the following equation:

SAI = 2.2 * (Vol)^0.6

Where:

SAI = the solvent/air interface area (square meters); and

Vol = the cleaning capacity of the solvent cleaning machine (cubic meters)

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

c. Sum the PTEi for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.

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

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group - Roller Coaters PTI 13-04237: K002, K003, K004, K005,

EU ID	Operations, Property and/or Equipment Description
K002	A ROLLER COATER FOR COATING METAL PARTS WITH ADHESIVE
K003	A ROLLER COATER FOR COATING METAL PARTS WITH ADHESIVE
K004	A ROLLER COATER FOR COATING METAL PARTS WITH ADHESIVE
K005	A ROLLER COATER FOR COATING METAL PARTS WITH ADHESIVE

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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 #13-04237, issued 9/30/04)	Volatile organic compound (VOC) emissions shall not exceed 19.8 pounds per day and 3.61 tons per year. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart MMMM.
b.	40 CFR Part 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products	See b)(2)a. – b)(2)d. below.
c.	OAC rule 3745-21-09(U)(2)(e)(ii)	See Section c)(1) below.

(2) Additional Terms and Conditions

a. The limit for an existing rubber to metal coating affected source in 40 CFR 63.3890(b)(4) is 4.5 kg organic HAP/liter of coating solids (or 37.7 lbs organic HAP/gal coating solids) used during each rolling, 12-month period.

[Authority for term: 40 CFR Part 63, Subpart MMMM and PTI #13-04237]

b. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

The final rules found in 40 CFR Part 63, Subpart MMMM establish national emission standards for hazardous air pollutants (NESHAP), work practice standards, and compliance requirements for miscellaneous metal parts coating operations.

The affected sources include the coating operations; all manual and automated equipment and containers/vessels used for conveying, storing, and mixing coatings, thinners, additives, purge, and cleaning materials; all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee shall become subject to the requirements and limitations of this NESHAP on January 2, 2007, at which time the initial compliance period begins for the coating operations. The initial compliance period ends on the last day of the 12th month following the compliance date.

[Authority for term: 40 CFR 63.3882(b) and 63.3883]

c. The permittee shall determine the method of compliance for each coating line and/or coating operation subject to 40 CFR Part 63, Subpart MMMM. The determination of the selected compliance method(s) shall be submitted in writing to the Cleveland Division of Air Quality (CDAQ) and at least 30 days before the compliance date. The appropriate compliance methods and record keeping requirements for each emissions unit subject to this NESHAP shall be implemented starting on the compliance date, January 2, 2007.

[Authority for term: 40 CFR 63.3883(d)]

d. For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.3890 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month on a rolling, 12-month basis.

[Authority for term: 40 CFR 63.3900(a)]

c) Operational Restrictions

(1) The permittee shall employ no more than 3 gallons of coatings in any one day for this emissions unit.

[Authority for term: OAC rule 3745-21-09(U)(2)(e)(ii) and PTI #13-04237]

(2) If the permittee can meet the emission limitation(s) contained in 40 CFR 63.3890 without add-on controls, by calculating the rolling, 12-month HAP emission rate at the end of each month, the permittee shall not be required to meet the operating limits contained in 40 CFR 63.3892 or work practice standards contained in 40 CFR 63.3893.

[Authority for term: 40 CFR 63.3892(a) and 63.3893(a)]

(3) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit (including the associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general

duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the CDAQ, which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or other standard operating procedures), operation and maintenance records, and inspection of the facility.

[Authority for term: 40 CFR 63.6(e)(1)]

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 and identification number of each coating employed;

b. the amount, in gallons, of each coating employed;

c. the total amount, in gallons, of all coatings employed;

d. the VOC content of each coating, in pounds per gallon, as applied; and

e. the total VOC emissions from all coatings, in pounds [summation of (b x d) for all coatings].

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(B)(3)(d), and PTI #13-04237]

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

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the miscellaneous metal parts coating operation(s), including information from the supplier or manufacturer, formulation data, and/or coating/material testing data;

b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:

i. Method 311 from 40 CFR Part 63, Appendix A;

ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP; or

iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pound HAP/gallon of material pounds/gallon of material, or calculated in kg/liter);

e. the volume fraction of coating solids (gallon of coating solids/gallon of coating or liter of coating solids/liter of coating) for each coating applied which can be calculated using one of the following methods:

i. divide the nonvolatile volume percent, obtained from either ASTM Method D2697-86 ("Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings") or Method D6093-97 ("Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer"), by 100 to convert percent to the volume fraction of coating solids; or

ii. calculated from: Vs = 1 - mvolatiles / Davg

where:

Vs is the volume fraction of coating solids, in gallon of coating solids/gallon of coating or liter of coating solids/liter of coating;

mvolatiles is the total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined in accordance to Method 24 in Appendix A of 40 CFR Part 60, in pound of volatile matter per gallon of coating or grams volatile matter per liter of coating;

Davg is the average density of volatile matter in the coating, i.e., pound of volatile matter per gallon of volatile matter or grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98 "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" or from information provided by the supplier or manufacturer, or from reference sources providing density or specific gravity data for pure materials; or

iii. the volume fraction of coating solids can be calculated using information provided by the manufacturer, by using the following information to convert percent by weight to percent by volume, if not provided directly:

(a) for each coating, change the percent by weight solids, percent by weight water, and percent by weight total solvent to the same

number of "pounds" or "kilograms" (by assuming 100 pounds {or kg} of coating is applied) and divide each component's assumed "weight" by its density in the coating, to get the gallons of solids, gallons of water, and gallons of solvent;

(b) add the gallons of solids, gallons of water, and gallons of solvent from (a); and

(c) divide the gallons of solids, from (a) by the sum of the gallons of coating components from (b), to get the volume fraction of coating solids (gallon of coating solids per gallon of coating or liter of coating solids per liter of coating);

f. the total mass of organic HAP (pound or kg) in all of the coatings, thinners/additives, and cleanup/purge materials (as purchased) applied during the month, calculated separately for coatings, thinners/additives, and cleanup/purge materials as follows:

HAP = summation of (VOLi) (Di) (Wi) for i = 1, r

where:

HAP is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials used each month, in pound or kg of HAP for each: 1. the coatings (HAPc), 2. thinners/additives (HAPt), and 3. cleanup/purge materials (HAPcu).

VOLi is the volume of material "i" documented in d)(2)b. above, in gallons or liters.

Di is the density of material "i" as documented in d)(2)c. above, in pounds/gallon or kg/liter.

Wi is the mass fraction of organic HAP in material "i" as calculated in d)(2)d. above, in pound/pound or kg/kg.

r is the number of coatings, the number of thinners/additives, or the number of cleanup/purge materials used during the month, each source (coating, thinner/additive, cleanup/purge) calculated separately for its HAP.

g. the total mass of organic HAP emissions for each month, calculated as follows:

HAPTOT = HAPc + HAPt + HAPcu - Rw

where:

HAPTOT is the total mass of organic HAP emissions for the month, in pound or kg.

HAPc is the total mass of organic HAP emissions from all the coatings used during the month, summed from the total mass of HAP calculated from all the coatings applied, as required in d)(2)f. above, in pound or kg.

HAPt is the total mass of organic HAP emissions from all thinners/additives used during the month, summed from the total mass of HAP calculated from all the thinners/additives applied, as required in d)(2)f. above, in pound or kg.

HAPcu is the total mass of organic HAP emissions from all cleanup and purge materials used during the month, summed from the total mass of HAP calculated from all the cleanup/purge materials applied, as required in d)(2)f. above, in pound or kg.

Rw is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to Rw if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for disposal).

h. the total volume of coating solids applied during the month, calculated as follows:

VOLs = summation of (VOLh) (Vh) for h = 1, m

where:

VOLs is the total volume of coating solids used during the month, in gallons or liters.

VOLh is the total volume of coating "h" used during the month, as documented in d)(2)b. above, in gallons or liters.

Vh is the volume fraction of coating solids for coating "h", in liter of solids per liter coating or gallon of solids per gallon of coating, calculated as required in d)(2)e. above.

m is the number of coatings applied during the month.

i. the total organic HAP emission rate for the 12-month compliance period, in pound of HAP per gallon of coating solids or kg of HAP per liter of coating solids applied during the rolling, 12-month compliance period, calculated as follows:

HAPcomply = [summation of (HAPTOT, y) for y = 1, 12] divided by [summation of (VOLs, y) for y = 1, 12]

HAPcomply is the total organic HAP emission rate for the 12-month compliance period, in pound organic HAP emitted per gallon of coating solids applied or kg organic HAP emitted per liter of coating solids applied.

HAPTOT, y is the total mass of organic HAP emissions from all materials used during month y, calculated in d)(2)g. above, in pound or kg.

VOLs, y is the total volume of coating solids used during month y, calculated in d)(2)h. above, in gallons or liters.

y is the identifier for the month; and

j. all calculations required by this permit for each rolling 12-month compliance period.

In order to demonstrate continuous compliance, the organic HAP emission rate for each rolling 12-month compliance period, must be less than or equal to the applicable emission limit in 40 CFR 63.3890. Following the initial compliance period (the 12th month following the compliance date), the compliance demonstration shall be conducted on a monthly basis using data and documentation from the previous 12 months of operation in the above calculations.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

[Authority for term: 40 CFR 63.3930, 63.3931, 63.3950, 63.3951, and 63.3952]

(3) The permittee shall also maintain the following records for the miscellaneous metal parts coating line:

A copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.3890 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting the CDAQ. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

[Authority for term: 40 CFR 63.3930(a) and 63.3931]

e) Reporting Requirements

(1) The permittee shall notify the CDAQ in writing of any daily record showing that this emissions unit employs more than 3 gallons of coating, as recorded in Section A.III.1.c. This notification shall include a copy of such record and shall be sent to the CDAQ within 30 days* after the exceedance occurs.

*Note: the reporting frequency established pursuant to PTI #13-04237, issued 9/30/04 (within 30 days after the exceedance) is more stringent than the reporting frequency established pursuant to OAC rule 3745-21-09(B)(3)(e) (within 45 days after the exceedance).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04237]

(2) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 or January 31 following the end of each semiannual reporting period (June 30 or December 31). The first semiannual compliance period shall begin the day after the end of the initial compliance period, as described in this permit. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of the compliance method as the "without add-on control" option;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period for the uncontrolled coating operations or the limitation from 40 CFR 63.3890 for each type of compliant coating applied;

g. if there were no deviations, a statement that there were no deviations from the emissions limitations during the reporting period; and

h. if there were any deviations during the compliance period, the report shall include the following information:

i. deviations from coating applications without add-on control shall include the following information:

(a) the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;

(b) the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

(c) if applicable, the calculation used to determine mass of organic HAP in waste materials; and

(d) a statement of the cause of each deviation

[Authority for term: 40 CFR 63.3920(a)] None.

f) Testing Requirements

(1) Compliance with the emission limitation(s) in Section b)(1) of the terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

VOC emissions shall not exceed 19.8 pounds per day.

Applicable Compliance Method

Compliance shall be based upon the record keeping in Section c)(1). U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04237]

b. Emission Limitation:

VOC emissions shall not exceed 3.61 tons per year.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the daily VOC emission rate by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the lb/day limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04237]

c. Emission Limitation

The limit for an existing rubber to metal coating affected source in 40 CFR 63.3890(b)(4) is 4.5 kg organic HAP/liter of coating solids (or 37.7 lbs organic HAP/gal coating solids) used during each rolling, 12-month period.

Applicable Compliance Method

Compliance shall be based upon the record keeping and reporting in Sections d)(2) and e)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04237]

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group - Roller Coaters PTI 13-04576: K009, K010, K011, K012, K013, K014,

EU ID	Operations, Property and/or Equipment Description
K009	A ROLLER COATING STATION FOR COATING METAL PARTS WITH ADHESIVE
K010	A ROLLER COATING STATION FOR COATING METAL PARTS WITH ADHESIVE
K011	A ROLLER COATING STATION FOR COATING METAL PARTS WITH ADHESIVE
K012	A ROLLER COATING STATION FOR COATING METAL PARTS WITH ADHESIVE
K013	A ROLLER COATING STATION FOR COATING METAL PARTS WITH ADHESIVE
K014	A ROLLER COATING STATION FOR COATING METAL PARTS WITH ADHESIVE

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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 #13-04576, issued on 1/31/06)	Volatile organic compound (VOC) emissions shall not exceed 19.8 pounds per day and 3.61 tons per year. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart MMMM.
b.	40 CFR Part 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products	See b)(2)a – b)(2)d below.
c.	OAC rule 3745-21-09(U)(2)(e)(ii)	See c)(1) below.

(2) Additional Terms and Conditions

a. The limit for an existing rubber to metal coating affected source in 40 CFR 63.3890(b)(4) is 4.5 kg organic HAP/liter of coating solids (or 37.7 lbs organic HAP/gal coating solids) used during each rolling, 12-month period.

[Authority for term: 40 CFR Part 63, Subpart MMMM and PTI #13-04237]

b. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the

United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

The final rules found in 40 CFR Part 63, Subpart MMMM establish national emission standards for hazardous air pollutants (NESHAP), work practice standards, and compliance requirements for miscellaneous metal parts coating operations.

The affected sources include the coating operations; all manual and automated equipment and containers/vessels used for conveying, storing, and mixing coatings, thinners, additives, purge, and cleaning materials; all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee shall become subject to the requirements and limitations of this NESHAP on January 2, 2007, at which time the initial compliance period begins for the coating operations. The initial compliance period ends on the last day of the 12th month following the compliance date.

[Authority for term: 40 CFR 63.3882(b) and 63.3883]

c. The permittee shall determine the method of compliance for each coating line and/or coating operation subject to 40 CFR Part 63, Subpart MMMM. The determination of the selected compliance method(s) shall be submitted in writing to the Cleveland Division of Air Quality (CDAQ) and at least 30 days before the compliance date. The appropriate compliance methods and record keeping requirements for each emissions unit subject to this NESHAP shall be implemented starting on the compliance date, January 2, 2007.

[Authority for term: 40 CFR 63.3883(d)]

d. For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.3890 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month on a rolling, 12-month basis.

[Authority for term: 40 CFR 63.3900(a)]

c) Operational Restrictions

(1) The permittee shall employ no more than 3 gallons of coatings in any one day for this emissions unit.

[Authority for term: OAC rule 3745-21-09(U)(2)(e)(ii) and PTI #13-04237]

(2) If the permittee can meet the emission limitation(s) contained in 40 CFR 63.3890 without add-on controls, by calculating the rolling, 12-month HAP emission rate at the end of each month, the permittee shall not be required to meet the operating limits contained in 40 CFR 63.3892 or work practice standards contained in 40 CFR 63.3893.

[Authority for term: 40 CFR 63.3892(a) and 63.3893(a)]

(3) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit (including the associated air pollution control equipment and monitoring

equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the CDAQ, which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or other standard operating procedures), operation and maintenance records, and inspection of the facility.

[Authority for term: 40 CFR 63.6(e)(1)]

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 and identification number of each coating employed;

b. the amount, in gallons, of each coating employed;

c. the total amount, in gallons, of all coatings employed;

d. the VOC content of each coating, in pounds per gallon, as applied; and

e. the total VOC emissions from all coatings, in pounds [summation of (b x d) for all coatings].

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(B)(3)(d), and PTI #13-04576]

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

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the miscellaneous metal parts coating operation(s), including information from the supplier or manufacturer, formulation data, and/or coating/material testing data;

b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:

   i. Method 311 from 40 CFR Part 63, Appendix A;

   ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP; or

   iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pound HAP/gallon of material pounds/gallon of material, or calculated in kg/liter);

e. the volume fraction of coating solids (gallon of coating solids/gallon of coating or liter of coating solids/liter of coating) for each coating applied which can be calculated using one of the following methods:

   i. divide the nonvolatile volume percent, obtained from either ASTM Method D2697-86 ("Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings") or Method D6093-97 ("Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer"), by 100 to convert percent to the volume fraction of coating solids; or

   ii. calculated from: Vs = 1 - mvolatiles / Davg

   where:

   Vs is the volume fraction of coating solids, in gallon of coating solids/gallon of coating or liter of coating solids/liter of coating;

   mvolatiles is the total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined in accordance to Method 24 in Appendix A of 40 CFR Part 60, in pound of volatile matter per gallon of coating or grams volatile matter per liter of coating;

   Davg is the average density of volatile matter in the coating, i.e., pound of volatile matter per gallon of volatile matter or grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98 "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" or from information provided by the supplier or manufacturer, or from reference sources providing density or specific gravity data for pure materials; or

iii. the volume fraction of coating solids can be calculated using information provided by the manufacturer, by using the following information to convert percent by weight to percent by volume, if not provided directly:

(a) for each coating, change the percent by weight solids, percent by weight water, and percent by weight total solvent to the same number of "pounds" or "kilograms" (by assuming 100 pounds {or kg} of coating is applied) and divide each component's assumed "weight" by its density in the coating, to get the gallons of solids, gallons of water, and gallons of solvent;

(b) add the gallons of solids, gallons of water, and gallons of solvent from (a); and

(c) divide the gallons of solids, from (a) by the sum of the gallons of coating components from (b), to get the volume fraction of coating solids (gallon of coating solids per gallon of coating or liter of coating solids per liter of coating);

f. the total mass of organic HAP (pound or kg) in all of the coatings, thinners/additives, and cleanup/purge materials (as purchased) applied during the month, calculated separately for coatings, thinners/additives, and cleanup/purge materials as follows:

HAP = summation of (VOLi) (Di) (Wi) for i = 1, r

where:

HAP is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials used each month, in pound or kg of HAP for each: 1. the coatings (HAPc), 2. thinners/additives (HAPt), and 3. cleanup/purge materials (HAPcu).

VOLi is the volume of material "i" documented in d)(2)b. above, in gallons or liters.

Di is the density of material "i" as documented in d)(2)c. above, in pounds/gallon or kg/liter.

Wi is the mass fraction of organic HAP in material "i" as calculated in d)(2)d. above, in pound/pound or kg/kg.

r is the number of coatings, the number of thinners/additives, or the number of cleanup/purge materials used during the month, each source (coating, thinner/additive, cleanup/purge) calculated separately for its HAP.

g. the total mass of organic HAP emissions for each month, calculated as follows:

HAPTOT = HAPc + HAPt + HAPcu - Rw

where:

HAPTOT is the total mass of organic HAP emissions for the month, in pound or kg.

HAPc is the total mass of organic HAP emissions from all the coatings used during the month, summed from the total mass of HAP calculated from all the coatings applied, as required in d)(2)f. above, in pound or kg.

HAPt is the total mass of organic HAP emissions from all thinners/additives used during the month, summed from the total mass of HAP calculated from all the thinners/additives applied, as required in d)(2)f. above, in pound or kg.

HAPcu is the total mass of organic HAP emissions from all cleanup and purge materials used during the month, summed from the total mass of HAP calculated from all the cleanup/purge materials applied, as required in d)(2)f. above, in pound or kg.

Rw is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to Rw if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for disposal).

h. the total volume of coating solids applied during the month, calculated as follows:

VOLs = summation of (VOLh) (Vh) for h = 1, m

where:

VOLs is the total volume of coating solids used during the month, in gallons or liters.

VOLh is the total volume of coating "h" used during the month, as documented in (b) above, in gallons or liters.

Vh is the volume fraction of coating solids for coating "h", in liter of solids per liter coating or gallon of solids per gallon of coating, calculated as required in d)(2)e. above.

m is the number of coatings applied during the month.

i. the total organic HAP emission rate for the 12-month compliance period, in pound of HAP per gallon of coating solids or kg of HAP per liter of coating solids applied during the rolling, 12-month compliance period, calculated as follows:

HAPcomply = [summation of (HAPTOT, y) for y = 1, 12] divided by [summation of (VOLs, y) for y = 1, 12]

HAPcomply is the total organic HAP emission rate for the 12-month compliance period, in pound organic HAP emitted per gallon of coating solids applied or kg organic HAP emitted per liter of coating solids applied.

HAPTOT, y is the total mass of organic HAP emissions from all materials used during month y, calculated in d)(2)g. above, in pound or kg.

VOLs, y is the total volume of coating solids used during month y, calculated in d)(2)h. above, in gallons or liters.

y is the identifier for the month; and

j. all calculations required by this permit for each rolling 12-month compliance period.

In order to demonstrate continuous compliance, the organic HAP emission rate for each rolling 12-month compliance period, must be less than or equal to the applicable emission limit in 40 CFR 63.3890. Following the initial compliance period (the 12th month following the compliance date), the compliance demonstration shall be conducted on a monthly basis using data and documentation from the previous 12 months of operation in the above calculations.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

[Authority for term: 40 CFR 63.3930, 63.3931, 63.3950, 63.3951, and 63.3952]

(3) The permittee shall also maintain the following records for the miscellaneous metal parts coating line:

A copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.3890 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting the CDAQ. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

[Authority for term: 40 CFR 63.3930(a) and 63.3931]

e) Reporting Requirements

(1) The permittee shall notify the CDAQ in writing of any daily record showing that this emissions unit employs more than 3 gallons of coating, as recorded in Section d)(1)c. This notification shall include a copy of such record and shall be sent to the CDAQ within 30 days* after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI # PTI #13-04576]

(2) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 or January 31 following the end of each semiannual reporting period (June 30 or December 31). The first semiannual compliance period shall begin the day after the end of the initial compliance period, as described in this permit. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of the compliance method as the "without add-on control" option;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period for the uncontrolled coating operations or the limitation from 40 CFR 63.3890 for each type of compliant coating applied;

g. if there were no deviations, a statement that there were no deviations from the emissions limitations during the reporting period; and

h. if there were any deviations during the compliance period, the report shall include the following information:

i. deviations from coating applications without add-on control shall include the following information:

(a) the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;

(b) the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

(c) if applicable, the calculation used to determine mass of organic HAP in waste materials; and

(d) a statement of the cause of each deviation

[Authority for term: 40 CFR 63.3920(a)]

f) Testing Requirements

(1) Compliance with the emission limitation(s) in Section b)(1) of the terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

VOC emissions shall not exceed 19.8 pounds per day.

Applicable Compliance Method

Compliance shall be based upon the record keeping in Section d)(1). U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04576]

b. Emission Limitation:

VOC emissions shall not exceed 3.61 tons per year.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the daily VOC emission rate by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the lb/day limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04576]

c. Emission Limitation

The limit for an existing rubber to metal coating affected source in 40 CFR 63.3890(b)(4) is 4.5 kg organic HAP/liter of coating solids (or 37.7 lbs organic HAP/gal coating solids) used during each rolling, 12-month period.

Applicable Compliance Method

Compliance shall be based upon the record keeping and reporting in Sections d)(2) and e)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04576]

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group - Spin Coaters: K007, K008,

EU ID	Operations, Property and/or Equipment Description
K007	A SPIN COATING STATION FOR COATING METAL PARTS WITH ADHESIVE
K008	A SPIN COATING STATION FOR COATING METAL PARTS WITH ADHESIVE

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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 #13-04237, issued 9/30/04)	Volatile organic compound (VOC) emissions shall not exceed 19.8 pounds per day and 3.61 tons per year. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart MMMM.
b.	40 CFR Part 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products	See b)(2)a – b)(2)d below.
c.	OAC rule 3745-21-09(U)(2)(e)(ii)	See c)(1) below.

(2) Additional Terms and Conditions

a. The limit for an existing rubber to metal coating affected source in 40 CFR 63.3890(b)(4) is 4.5 kg organic HAP/liter of coating solids (or 37.7 lbs organic HAP/gal coating solids) used during each rolling, 12-month period.

[Authority for term: 40 CFR Part 63, Subpart MMMM and PTI #13-04237]

b. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

The final rules found in 40 CFR Part 63, Subpart MMMM establish national emission standards for hazardous air pollutants (NESHAP), work practice standards, and compliance requirements for miscellaneous metal parts coating operations.

The affected sources include the coating operations; all manual and automated equipment and containers/vessels used for conveying, storing, and mixing coatings, thinners, additives, purge, and cleaning materials; all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee shall become subject to the requirements and limitations of this NESHAP on January 2, 2007, at which time the initial compliance period begins for the coating operations. The initial compliance period ends on the last day of the 12th month following the compliance date.

[Authority for term: 40 CFR 63.3883 and 63.3882(b)]

c. The permittee shall determine the method of compliance for each coating line and/or coating operation subject to 40 CFR Part 63, Subpart MMMM. The determination of the selected compliance method(s) shall be submitted in writing to the Cleveland Division of Air Quality (CDAQ) and at least 30 days before the compliance date. The appropriate compliance methods and record keeping requirements for each emissions unit subject to this NESHAP shall be implemented starting on the compliance date, January 2, 2007.

[Authority for term: 40 CFR 63.3883(d)]

d. For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.3890 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month on a rolling, 12-month basis.

[Authority for term: 40 CFR 63.3900(a)]

c) Operational Restrictions

(1) The permittee shall employ no more than 3 gallons of coatings in any one day for this emissions unit.

[Authority for term: OAC rule 3745-21-09(U)(2)(e)(ii) and PTI #13-04237]

(2) If the permittee can meet the emission limitation(s) contained in 40 CFR 63.3890 without add-on controls, by calculating the rolling, 12-month HAP emission rate at the end of each month, the permittee shall not be required to meet the operating limits contained in 40 CFR 63.3892 or work practice standards contained in 40 CFR 63.3893.

[Authority for term: 40 CFR 63.3892(a) and 63.3893(a)]

(3) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit (including the associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general

duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the CDAQ, which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or other standard operating procedures), operation and maintenance records, and inspection of the facility.

[Authority for term: 40 CFR 63.6(e)(1)]

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 and identification number of each coating employed;

b. the amount, in gallons, of each coating employed;

c. the total amount, in gallons, of all coatings employed;

d. the VOC content of each coating, in pounds per gallon, as applied; and

e. the total VOC emissions from all coatings, in pounds [summation of (b x d) for all coatings].

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(B)(3)(d), and PTI #13-04237]

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

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the miscellaneous metal parts coating operation(s), including information from the supplier or manufacturer, formulation data, and/or coating/material testing data;

b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:

i. Method 311 from 40 CFR Part 63, Appendix A;

ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP; or

iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pound HAP/gallon of material pounds/gallon of material, or calculated in kg/liter);

e. the volume fraction of coating solids (gallon of coating solids/gallon of coating or liter of coating solids/liter of coating) for each coating applied which can be calculated using one of the following methods:

i. divide the nonvolatile volume percent, obtained from either ASTM Method D2697-86 ("Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings") or Method D6093-97 ("Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer"), by 100 to convert percent to the volume fraction of coating solids; or

ii. calculated from: Vs = 1 - mvolatiles / Davg

where

Vs is the volume fraction of coating solids, in gallon of coating solids/gallon of coating or liter of coating solids/liter of coating;

mvolatiles is the total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined in accordance to Method 24 in Appendix A of 40 CFR Part 60, in pound of volatile matter per gallon of coating or grams volatile matter per liter of coating;

Davg is the average density of volatile matter in the coating, i.e., pound of volatile matter per gallon of volatile matter or grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98 "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" or from information provided by the supplier or manufacturer, or from reference sources providing density or specific gravity data for pure materials; or

iii. the volume fraction of coating solids can be calculated using information provided by the manufacturer, by using the following information to convert percent by weight to percent by volume, if not provided directly:

(a) for each coating, change the percent by weight solids, percent by weight water, and percent by weight total solvent to the same number of "pounds" or "kilograms" (by assuming 100 pounds {or kg} of coating is applied) and divide each component's assumed "weight" by its density in the coating, to get the gallons of solids, gallons of water, and gallons of solvent;

(b) add the gallons of solids, gallons of water, and gallons of solvent from (a); and

(c) divide the gallons of solids, from (a) by the sum of the gallons of coating components from (b), to get the volume fraction of coating solids (gallon of coating solids per gallon of coating or liter of coating solids per liter of coating);

f. the total mass of organic HAP (pound or kg) in all of the coatings, thinners/additives, and cleanup/purge materials (as purchased) applied during the month, calculated separately for coatings, thinners/additives, and cleanup/purge materials as follows:

HAP = summation of (VOLi) (Di) (Wi) for i = 1, r

where:

HAP is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials used each month, in pound or kg of HAP for each: 1. the coatings (HAPc), 2. thinners/additives (HAPt), and 3. cleanup/purge materials (HAPcu).

VOLi is the volume of material "i" documented in d)(2)b. above, in gallons or liters.

Di is the density of material "i" as documented in d)(2)c. above, in pounds/gallon or kg/liter.

Wi is the mass fraction of organic HAP in material "i" as calculated in d)(2)d. above, in pound/pound or kg/kg.

r is the number of coatings, the number of thinners/additives, or the number of cleanup/purge materials used during the month, each source (coating, thinner/additive, cleanup/purge) calculated separately for its HAP.

g. the total mass of organic HAP emissions for each month, calculated as follows:

HAPTOT = HAPc + HAPt + HAPcu - Rw

where:

HAPTOT is the total mass of organic HAP emissions for the month, in pound or kg.

HAPc is the total mass of organic HAP emissions from all the coatings used during the month, summed from the total mass of HAP calculated from all the coatings applied, as required in d)(2)f. above, in pound or kg.

HAPt is the total mass of organic HAP emissions from all thinners/additives used during the month, summed from the total mass of HAP calculated from all the thinners/additives applied, as required in d)(2)f. above, in pound or kg.

HAPcu is the total mass of organic HAP emissions from all cleanup and purge materials used during the month, summed from the total mass of HAP calculated from all the cleanup/purge materials applied, as required in d)(2)f. above, in pound or kg.

Rw is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to Rw if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for disposal).

h. the total volume of coating solids applied during the month, calculated as follows:

VOLs = summation of (VOLh) (Vh) for h = 1, m

where:

VOLs is the total volume of coating solids used during the month, in gallons or liters.

VOLh is the total volume of coating "h" used during the month, as documented in d)(2)b. above, in gallons or liters.

Vh is the volume fraction of coating solids for coating "h", in liter of solids per liter coating or gallon of solids per gallon of coating, calculated as required in d)(2)e. above.

m is the number of coatings applied during the month.

i. the total organic HAP emission rate for the 12-month compliance period, in pound of HAP per gallon of coating solids or kg of HAP per liter of coating solids applied during the rolling, 12-month compliance period, calculated as follows:

HAPcomply = [summation of (HAPTOT, y) for y = 1, 12] divided by [summation of (VOLs, y) for y = 1,12]

HAPcomply is the total organic HAP emission rate for the 12-month compliance period, in pound organic HAP emitted per gallon of coating solids applied or kg organic HAP emitted per liter of coating solids applied.

HAPTOT, y is the total mass of organic HAP emissions from all materials used during month y, calculated in d)(2)g. above, in pound or kg.

VOLs, y is the total volume of coating solids used during month y, calculated in d)(2)h. above, in gallons or liters.

y is the identifier for the month; and

j. all calculations required by this permit for each rolling 12-month compliance period.

In order to demonstrate continuous compliance, the organic HAP emission rate for each rolling 12-month compliance period, must be less than or equal to the applicable emission limit in 40 CFR 63.3890. Following the initial compliance period (the 12th month following the compliance date), the compliance demonstration shall be conducted on a monthly basis using data and documentation from the previous 12 months of operation in the above calculations.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

[Authority for term: 40 CFR 63.3930, 63.3931, 63.3950, 63.3951, and 63.3952]

(3) The permittee shall also maintain the following records for the miscellaneous metal parts coating line:

A copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.3890 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

[Authority for term: 40 CFR 63.3930(a) and 63.3931]

e) Reporting Requirements

(1) The permittee shall notify the CDAQ in writing of any daily record showing that this emissions unit employs more than 3 gallons of coating, as recorded in Section A.III.1.c. This notification shall include a copy of such record and shall be sent to the CDAQ within 30 days* after the exceedance occurs.

*Note: the reporting frequency established pursuant to PTI #13-04237, issued 9/30/04 (within 30 days after the exceedance) is more stringent than the reporting frequency established pursuant to OAC rule 3745-21-09(B)(3)(e) (within 45 days after the exceedance).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04237]

(2) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 or January 31 following the end of each semiannual reporting

period (June 30 or December 31). The first semiannual compliance period shall begin the day after the end of the initial compliance period, as described in this permit. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of the compliance method as the "without add-on control" option;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period for the uncontrolled coating operations or the limitation from 40 CFR 63.3890 for each type of compliant coating applied;

g. if there were no deviations, a statement that there were no deviations from the emissions limitations during the reporting period; and

h. if there were any deviations during the compliance period, the report shall include the following information:

i. deviations from coating applications without add-on control shall include the following information:

the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;

the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

if applicable, the calculation used to determine mass of organic HAP in waste materials; and

a statement of the cause of each deviation

[Authority for term: 40 CFR 63.3920(a)]

f) Testing Requirements

(1) Compliance with the emission limitation(s) in Section b)(1) of the terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

VOC emissions shall not exceed 19.8 pounds per day.

Applicable Compliance Method

Compliance shall be based upon the record keeping in d)(1). U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04237]

(2) Emission Limitation:

VOC emissions shall not exceed 3.61 tons per year.

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the daily VOC emission rate by the maximum operating schedule of 365 days/year, and dividing by 2000 pounds/ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the lb/day limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04237]

(3) Emission Limitation

The limit for an existing rubber to metal coating affected source in 40 CFR 63.3890(b)(4) is 4.5 kg organic HAP/liter of coating solids (or 37.7 lbs organic HAP/gal coating solids) used during each rolling, 12-month period.

Applicable Compliance Method

Compliance shall be based upon the record keeping and reporting in d)(2) and e)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #13-04237]

g) Miscellaneous Requirements

(1) None.