OhioEPA

State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

03/05/2009

CERTIFIED MAIL

RE: Final Title V Administrative Permit Amendment
Chapter 3745-77 permit

05-75-01-0103
Alcoa Home Exteriors
Jesse D Aiken
Alcoa Home Exteriors, Inc.
2405 Campbell Road
Sidney, OH 45365

Dear Jesse D Aiken:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Southwest District Office.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: Southwest District Office
File, DAPC PIER

State of Ohio Environmental Protection Agency

FINAL TITLE V ADMINISTRATIVE PERMIT AMENDMENT

Original Effective Date:	Expiration Date:	Modification Effective Date:
06/13/2008	06/13/2013	03/05/2009

This document constitutes issuance of a Title V permit for Facility ID: 05-75-01-0103 to:
The duration of this permit will be five years.

Alcoa Home Exteriors
2615 Campbell Road
Sidney, OH 45365

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B009 (Production Area AMU)
Production Area Air Makeup Unit, 10 mmBTU/hr

B010 (Slitter Area AMU)
Slitter Area Air Makeup Unit, 10 mmBTU/hr

F001 (Site Roadways)
Site Roadways. Formerly Z005. Changed to F001 as part of the 9/07 Title V significant modification application.

K001 (39" Coil Coating Line)
Coil Coating Line with wet section, pretreatment coater/oven, coater room air makeup unit, primer coater/oven/incinerator/quench, finish coater/oven/incinerator/quench.

K002 (54" Coil Coating Line)
Coil Coating Line with wet section, pretreatment coater/oven, coater room air makeup unit, primer coater/oven/quench, finish coater/oven/quench, regenerative thermal oxidizer.

P010 (Paint Mix Room)
Paint Mix/Clean-Up Room

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. 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. 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, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Southwest District Office
401 East Fifth Street
Dayton, OH 45402-2911
(513) 285-6357

Ohio Environmental Protection Agency

Chris Korleski
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. 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 A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. 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:

i. **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 General Term and Condition A.1.c.ii 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))

ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II 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 General 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 General Term and Condition.

See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

iii. **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 General Term and Condition A.1.c.ii 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; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit**,** and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii 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 Part II.A 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 General Term and Condition A.1.c.ii 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))

iv. 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))

v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. 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 General Term and Condition A.1.c.i above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. 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))

4. 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))

5. 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))

6. 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 A.10 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 upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:

   i. 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
   ii. 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

   iii. a combination of i. and ii. above.

   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))

7. 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))

8. 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))

9. 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 general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. 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))

11. 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))

12. 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:

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

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
ii. 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:

i. 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.

ii. 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.

iii. 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))

13. 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))

14. 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))

15. 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))

16. 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))

17. 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.)

18. 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))

19. 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))

20. 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))

21. 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)

22. 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))

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

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.)

2. Records Retention Requirements

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.

3. 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.

4. 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).

5. 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.

6. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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 General Term and Condition A.1.c.ii; 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.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. The following insignificant emissions units are located at this facility, These emissions units either comply with one of the exemptions under OAC rule 3745-31-03 or are defined as "insignificant" under OAC rule 3745-77-01(U):

B001, Boiler #1;
B002, Boiler #2;
B003, Boiler #3;
B004, Boiler #4;
B005, Boiler #5;
B006, Boiler #6;
B007, Boiler #7;
B008, Boiler #8;
P020, Diesel Backup Water Pump;
B011, Trim Sheet Area AMU;
B012, Bldg. 1 AMU #1;
B013, Bldg. 1 AMU #2;
B014, Bldg. 1 AMU #3;
B015, Bldg. 1 AMU #4;
K010, Small Parts Spray Booth;
P011, EZ Mix Custom Color Lab;
T009, Cylindrical Tank #1;
T010, Cylindrical Tank #2;
T011, Cylindrical Tank #3; and
T012, Cylindrical Tank #4.

2. The following emissions units located at this facility are subject to 40 CFR Part 63, Subpart SSSS, the Coil Coating MACT; K001, and K002.

3. The following emissions units located at this facility are subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM); K001, and K002.

The company has stated that they will comply with the requirements of CAM through the use of the MACT requirements. The requirements of the MACT, which addresses HAP(s), will be used to verify the CAM requirements for VOC.

B. State Only Enforceable Section

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

B016, Warehouse Spray Booth AMU;
B017, Warehouse Boiler;
B018, Fire System Boiler;
B019, Propane System Vaporizer;
B020, Small Heaters & HVAC Units;
F002, Cutting Torches;
F003, Cooling Tower #1;
F004, Cooling Tower #2;
F005, Cooling Tower #3;
F006, Cooling Tower #4;
F007, Paint Lab;
F008, Roll Forming Lines;
L001, Maintenance Parts Washer;
L002, Tow Motor Repair Parts Washer;
P021, Perforator Machine;
P022, Maintenance Roll Etch;
P023, Maintenance Sandblast Cabinet;
P901, 39" Slitter;
P902, 54" Slitter;
P903, 24" Slitter;
P904, Paint Roll Grind #1;
P905, Paint Roll Grind #2;

P906, Propane Maintenance Welders;
P907, Electrical Maintenance Welders;
T005, Rectangular Tank #1;
T006, Rectangular Tank #2;
T007, Rectangular Tank #3;
T017, Cylindrical Tank #6;
T018, Cylindrical Tank #7;
T019, Cylindrical Tank #5;
Z153, QA Dogbone Press;
Z154, Aluminum Scrap Compactor;
Z155, Cardboard Bailer;
Z231, Trim Line #1;
Z232, Trim Line #2;
Z233, Trim Line #3;
Z235, Salvage Rewind Line;
Z261, Totes and Drums;

B. State Only Enforceable Section (continued)

T013, 30,000 Gal Propane Tank #1,
T014, 30,000 Gal Propane Tank #2,
T015, 200 gal. Diesel Storage Tank,
T016, 200 gal Gasoline Storage Tank;
Z051, Propane Mobile Equipment;
Z052, Diesel Mobile Equipment;
Z053, Gasoline Maintenance Equipment;
Z111, Band Saws,
Z112, Belt Sanders;
Z113, Cutoff Saws,
Z115, Maintenance Lathe,
Z118, Bench Grinders,
Z119, Drill Press,
Z123, Shears,
Z125, Keyway Cutter,
Z126, Milling Machines,
Z127, Ultrasonic Cleaner,
Z128, Pipe Threading Machine,
Z129, Iron Worker;
Z151, Core Cutter;
Z162, Weather Lab;

Z234, Guttercoil Spindown,
Z252, Neutralization Tank System,
Z253, Potassium Hydroxide Tank,
Z260, Fire System Water Tank,
Z262, Fire Pump Diesel Tank,
Z263, Boiler Condensate Tank,
Z264, Water Treatment Chemical Tank,
Z265, Rollform Lube Tank,
Z281, Neutralization Holding Tank System,
Z282, Neutralization Agent Tank, and
Z283, Cleaner Day Tank.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Production Area AMU (B009)

Activity Description: Production Area Air Makeup Unit, 10 mmBTU/hr

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
10 mm BTU/hr, production area natural gas (with propane as backup fuel), direct-fired air make-up	OAC rule 3745-17-10	See Section A.I.2.a.
	OAC rule 3745-17-11	See Section A.I.2.b.
	OAC rule 3745-17-07	See Section A.I.2.c.
	OAC rule 3745-18-06(E)	See Section A.I.2.d.

2. Additional Terms and Conditions

2.a OAC rule 3745-17-10 regulates in-direct heat transfer fuel burning equipment. Since this emissions unit is direct heat transfer fuel burning equipment, the requirements of OAC rule 3745-17-10 do not apply.

2.b The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11, does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14), means the total weight of all materials introduced into the source operation, including solid fuels, but excluding gaseous fuels and liquid fuels when they are used solely as fuels, and excluding air introduced for the purpose of combustion.

* The burning of natural gas or propane is the only source of PE from this emissions unit.

2.c This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), purusant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rules 3745-17-08, 3745-17-09, 3745-17-10, or 3745-17-11.

2.d There are no sulfur dioxide emission limitations established by OAC chapter 3745-18 for this emissions unit because the process weight rate is less than 1,000 pounds per hour.

II. Operational Restrictions

1. The permittee shall burn only gaseous fuels (i.e., natural gas and/or propane gas) in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than a gaseous fuel (i.e., natural gas and/or propane gas), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or propane gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Slitter Area AMU (B010)

Activity Description: Slitter Area Air Makeup Unit, 10 mmBTU/hr

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Slitter Area 10 mm BTU/hr, production area natural gas (with propane as backup fuel), direct-fired air make-up unit	OAC rule 3745-17-10	See Section A.I.2.a.
	OAC rule 3745-17-11	See Section A.I.2.b.
	OAC rule 3745-17-07	See Section A.I.2.c.
	OAC rule 3745-18-06(E)	See Section A.I.2.d.

2. Additional Terms and Conditions

2.a OAC rule 3745-17-10 regulates in-direct heat transfer fuel burning equipment. Since this emissions unit is direct heat transfer fuel burning equipment, the requirements of OAC rule 3745-17-10 do not apply.

2.b The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11, does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14), means the total weight of all materials introduced into the source operation, including solid fuels, but excluding gaseous fuels and liquid fuels when they are used solely as fuels, and excluding air introduced for the purpose of combustion.

* The burning of natural gas or propane is the only source of PE from this emissions unit.

2.c This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), purusant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rules 3745-17-08, 3745-17-09, 3745-17-10, or 3745-17-11.

2.d There are no sulfur dioxide emission limitations established by OAC chapter 3745-18 for this emissions unit because the process weight rate is less than 1,000 pounds per hour.

II. Operational Restrictions

1. The permittee shall burn only gaseous fuels (i.e., natural gas and/or propane gas) in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than a gaseous fuel (i.e., natural gas and/or propane gas), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or propane gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Site Roadways (F001)

Activity Description: Site Roadways. Formerly Z005. Changed to F001 as part of the 9/07 Title V significant modification application.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Paved Plant Roadways and Parking Areas (F001)	OAC rule 3745-17-08(B)	See Section A.II.1.
	OAC rule 3745-17-07(B)(4)	No visible particulate emissions except for 6 minutes during any 60-minute period per OAC 3745-17-07(B)(4).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall maintain the paved roadways and parking areas in a manner that will minimize or eliminate any fugitive particulate emissions.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall, at a minimum, perform monthly inspections of the paved roadways and parking areas.

2. The permittee shall maintain monthly records of the following information:

a. the date when fugitive emissions were observed being emitted from the plant paved roadways and parking area;
b. the cause of the fugitive emissions;
c. the date corrective actions were taken to minimize or eliminate the fugitive emissions; and
d. what corrective actions were taken.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:

a. each month during which an inspection was not performed, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. each instance when a control measure that was to be implemented as a result of an inspection was not implemented.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

No visible particulate emissions except for 6 minutes during any 60-minute period.

Applicable Compliance Method:

If required, compliance with the visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 39" Coil Coating Line (K001)

Activity Description: Coil Coating Line with wet section, pretreatment coater/oven, coater room air makeup unit, primer coater/oven/incinerator/quench, finish coater/oven/incinerator/quench.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
(K001) - 39 inch Coil Coating Line with 2 natural gas, direct-fired ovens, equipped with thermal incinerators.	OAC rule 3745-21-09(E) and OAC rule 3745-21-09(B)(6)	When the capture and control system is not employed, VOC emissions shall not exceed 2.6 lbs/gallon of coating excluding water and exempt solvents, as the maximum VOC content of each coating or as a daily volume-weighted average; or when the capture and control system is employed, VOC emissions shall not exceed 4.0 lbs/gallon of solids as the maximum VOC emission rate of each coating, or as a daily volume-weighted average; or in lieu of OAC rule 3745-21-09(E) requirements, the capture and control system shall provide not less than an 81 percent reduction, by weight, in the overall VOC emissions from the coating line and the reduction efficiency of the thermal oxidizer shall not be less than 90 percent, by weight, for the VOC emissions vented to it.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR Part 63, Subpart SSSS	Compliance Option SSSSe: Organic HAP emissions shall not exceed 0.046 kg/liter (0.38 lbs/gallon) of solids applied during each rolling 12-month compliance period. Compliance Option SSSSce: Organic HAP emissions (stack and fugitive) shall not exceed 2 percent of the organic HAP applied during each rolling 12-month compliance period (98 percent reduction). See section A.I.2.a through c.
	OAC rule 3745-17-10	See Section A.I.2.d.
	OAC rule 3745-17-11	See Section A.I.2.e.
	OAC rule 3745-17-07(A)	See Section A.I.2.f.
	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See Section A.3 under the Facility Terms/Conditions.

2. Additional Terms and Conditions

2.a The permittee shall employ all of the associated monitoring, record keeping, reporting and testing methods required by this permit at all times for the compliance options that are being used to determine compliance for 40 CFR 63, Subpart SSSS.

2.b Compliance with the compliance options established pursuant to 40 CFR Part 63, Subpart SSSS may be demonstrated for each individual coating line, to multiple lines as a group, or to the entire affected source.

2.c Compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, shall be demonstrated by use of:

i. "as purchased" compliant coatings;
ii. "as applied" compliant coatings;
iii. using only always-controlled work stations vented to the thermal oxidizer; or
iv. a combination of compliant coatings and use of the thermal oxidizer and maintaining an acceptable equivalent emission rate.

2.d OAC rule 3745-17-10 regulates in-direct heat transfer fuel burning equipment. Since this emissions unit is direct heat transfer fuel burning equipment, the requirements of OAC rule 3745-17-10 do not apply.

2.e The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11, does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14), means the total weight of all materials introduced into the source operation, including solid fuels, but excluding gaseous fuels and liquid fuels when they are used solely as fuels, and excluding air introduced for the purpose of combustion.

* The burning of natural gas or propanr is the only source of PE from this emissions unit.

2.f This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), purusant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rules 3745-17-08, 3745-17-09, 3745-17-10, or 3745-17-11.

II. Operational Restrictions

1. When the emission unit is operating and the thermal oxidizer is used to demonstrate compliance with compliance options SSSSe or SSSSce, the emission capture system shall be operated and maintained according to the capture system monitoring plan required under 40 CFR 63.5150(a)(4).

2. Pursuant to 40 CFR 63.5170(f)(1)(ix)(B), when the emissions unit is operating and the thermal oxidizer is used to demonstrate compliance with compliance options SSSSe or SSSSce, the control device efficiency shall be determined to be zero for each instance where the 3-hour block average thermal oxidizer combustion temperature falls below the average combustion temperature limit established during the most recent emission test that demonstrated the emissions unit was in compliance.

3. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, using only always-controlled work stations vented to the thermal oxidizer, the permittee shall continuously monitor the operating parameter established in accordance with 40 CFR 63.5150(a)(3).

4. When a control device is employed to demonstrate compliance with the emissions limitations of 40 CFR Part 63, Subpart SSSS, the permittee shall maintain a monitoring system, including any applicable records, that would demonstrate continuous compliance with the average operating parameter values as established in 40 CFR 63.5150(a)(3) for each 3-hour block period, each capture system operating parameter value as established in 40 CFR 63.5150(a)(4) for each 3-hour block period; and the appropriate organic HAP emission rate based on solids applied, as required by 40 CFR Part 63, Subpart SSSS.

5. When determining compliance with OAC rule 3745-21-09(E) by the use of the option provided in OAC rule 3745-21-09(B)(6), the permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the coating line is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

III. Monitoring and/or Record Keeping Requirements

1. When complying with the 2.6 lbs/gallon, excluding water and exempt solvents, VOC emission limit per OAC rule 3745-21-09(E) through the use of complying coatings, the permittee shall collect and record the following daily information:

1.a the date the specific coating process was operated and not vented to the control device;

1.b the specific coating process that was operated without being vented to the control device;

1.c the name and identification number of each coating employed in the specific coating process; and

1.d the VOC content of each coating employed in the specific coating process, in pounds per gallon of coating, excluding water and exempt solvents.

2. When complying with the 2.6 lbs/gallon, excluding water and exempt solvents, VOC emission limit per OAC 3745 21-09(E) as a daily volume-weighted average:

2.a the date the specific coating process was operated and not vented to the control device;

2.b the specific coating process that was operated without being vented to the control device;

2.c the name and identification number of each coating employed in the specific coating process;

2.d the VOC content of each coating employed in the specific coating process, in pounds per gallon of coating, excluding water and exempt solvents, as applied;

2.e the total amount of each coating employed in the specific coating process, in gallons per day, excluding water and exempt solvents, as applied;

2.f the total amount of all coatings employed, in gallons per day, excluding water and exempt solvents (the summation of: [the total of each coating employed ("e")]);

III. Monitoring and/or Record Keeping Requirements (continued)

2.g the total amount of VOC emitted from the coatings employed, in pounds per day (the summation of: [the total of each ("d" x "e")]); and

2.h the daily volume weighted average VOC discharged from the coatings employed, in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied ("g"/"f").

3. When complying with the 4.0 lbs/gallon of solids VOC emission limit per OAC 3745-21-09(E), permittee shall collect and record the following monthly information:

3.a A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;

3.b All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

3.c the date the specific coating process was operated and vented to the control device;

3.d the specific coating process that was operated and vented to the control device;

3.e the name and identification number of each coating employed in the specific coating process;

3.f the VOC content of each coating employed in the specific coating process, in pounds per gallon of coating, as applied;

3.g the solids content of each coating, in percent by volume;

3.h the total amount of each coating employed in the specific coating process, in gallons per day, as applied;

3.i the amount of solids applied from each coating employed, in gallons per day ("g" x "h").

3.j the total amount of solids applied, in gallons per day (the summation of: (all "i"));

3.k if demonstrating compliance based on the maximum VOC content of all coatings employed, in pounds per gallon of coating solids, as applied;

i. maximum VOC content of all coatings employed, in pounds per gallon of coating, as applied (the maximum of all "f");

ii. the amount of VOC generated from the coatings employed, in pounds per day ({the combined total of all "h"} x "k.i");

iii. the amount of VOC emitted from the coatings employed, in pounds per day ("k.ii" x [1- (overall removal efficiency of the capture and control system)]); and

iv. the calculated, controlled VOC emission rate, in pounds per gallon of coating solids, as applied ("k.iii" / "j").

3.l When demonstrating compliance based on the daily volume weighted average VOC content of all coating employed, in pounds per gallon of coating solids, as applied;

i. the amount of VOC generated from each coating employed, in pounds per day ("f" x "h");

ii. the total amount of VOC's generated, in pounds per day (the summation of: (all "l.i.");

iii. the total amount of VOC discharged, in pounds per day, (the summation of: ["l.i." x (1- Overall removal efficiency of the capture and control system)]); and

iv. the daily volume weighted average VOC discharged from the coatings employed, in pounds of VOC per gallon of solids applied ("l.iii"/"j").

III. Monitoring and/or Record Keeping Requirements (continued)

4. When determining compliance with OAC rule 3745-21-09(E) by the use of the 81% overall capture and control and 90% destruction efficiency requirements of OAC rule 3745-21-09(B)(6), the permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the line was operating and the average combustion temperature within the thermal incinerator associated with a specific drying oven was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

b. A log of the operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

5. When determining compliance with 40 CFR Part 63, Subpart SSSS using continuous or intermittent use of the thermal oxidizer, the permittee shall install, operate, monitor and inspect each monitoring, capture and control device as described below to comply with 40 CFR Part 63, Subpart SSSS:

5.a Temperature monitoring of oxidizer per 40 CFR 63.5150(a)(3) and Table 1 to 40 CFR Part 63, Subpart SSSS. The permittee shall comply with the following:

i. install , calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every 3 months; or the chart recorder, data logger, or temperature indicator shall be replaced. The permittee shall replace the equipment either if the permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly. Each temperature monitoring device shall be equipped with a continuous recorder. The device shall have an accuracy of ±1 percent of the temperature being monitored in degrees Celsius, or ±1 degrees Celsius, whichever is greater;

ii. install the thermocouple or temperature sensor in the combustion chamber at a location in the combustion zone; and

iii. reduce the data to 3-hour block averages.

5.b Capture system monitoring per 40 CFR 63.5150(a)(4). The permittee shall develop a capture system monitoring plan containing the information specified in paragraphs (i.) and (ii.) of this section. The permittee shall monitor the capture system in accordance with paragraph (iii.) of this section. The permittee shall make the monitoring plan available for inspection by the permitting authority upon request.

i. The monitoring plan shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures.

ii. The plan also shall specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with the standards in sections A.I.1 and A.I.2. The operating limits shall represent the conditions indicative of proper operation and maintenance of the capture system.

iii. The permittee shall conduct monitoring in accordance with the plan.

6. Pursuant to 40 CFR 63.5190(a)(1), the permittee shall maintain records on which 40 CFR Part 63, Subpart SSSS compliance option was used and the time periods (beginning and ending dates and times) each option was used on K001.

III. Monitoring and/or Record Keeping Requirements (continued)

7. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, using coatings that individually meet the organic HAP emission limits as-purchased, to which the permittee will not add HAP during distribution or application, the permittee shall calculate the following:

a. The as-purchased, organic HAP to solids ratio of coating material for each coating material applied (Hp) during the 12-month period using the following equation:

Hp = (Chi x Di) / Vsi

where:

Hp = the hazardous air pollutant to solids ratio of the coating materials, as purchased;
Chi = organic HAP content of coating material (kg/kg);
Di = density of coating material (kg/l); and
Vsi = volume fraction of solids in coating (l/l).

b. The affected source is in compliance if the as-purchased organic HAP to solids ratio of coating material for each coating material applied (Hp) during the 12-month period is less than or equal to 0.046 kg/l of solids applied.

8. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, using "as-applied" compliant coatings, based on the average organic HAP content on the basis of solids applied for each coating material applied, during the 12-month period, the permittee shall determine the organic HAP emission rate according to the requirements of 40 CFR Part 63, Subpart SSSS and shall maintain the following monthly information:

8.a the name and identification number of each coating and any added solvent(s) applied;

8.b the organic HAP content of each coating and any added solvent(s), in pounds per gallon of coating, as applied;

8.c the total amount of each coating and any added solvent(s) applied, in gallons per month;

8.d the monthly organic HAP emissions from each coating and any added solvent(s) applied, in pounds per month ("b" x c");

8.e the solids content of each coating and any added solvent(s), in percent by volume;

8.f the amount of solids applied from each coating and any added solvent(s), in gallons per month ("c" x "e");

8.g the total organic HAP emissions from each coating and any added solvent(s), in pounds per rolling 12-month period, (the summation of: (total organic HAP emitted for the current month ("d") plus the total amount of organic HAP emissions ("d") for the 11 previous calendar months));

8.h the total solids applied from each coating and any added solvent(s), in gallons per rolling 12-month period (the summation of: (total solids applied for the current month ("f") plus the total amount of solids applied ("f") for the 11 previous calendar months));

8.i the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids for each coating and any added solvent(s), in pounds per gallon ("g" / "h"); and

8.j the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids for each coating and any added solvent(s), in kilograms per liter ("i" x 0.1198).

9. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, using "as-applied" compliant coatings, based on the average organic HAP content on the basis of solids applied of all coating materials applied, the permittee shall calculate the organic HAP emission rate according to the requirement of 40 CFR Part 63, Subpart SSSS and shall maintain the following monthly information:

9.a the name and identification number of each coating and any added solvent(s) applied;

III. Monitoring and/or Record Keeping Requirements (continued)

9.b the organic HAP content of each coating and any added solvent(s), in pounds per gallon of coating, as applied;

9.c the total amount of each coating and any added solvent(s) applied, in gallons per month;

9.d the monthly organic HAP emissions from each coating and any added solvent(s) applied, in pounds per month ("b" x c");

9.e the total organic HAP emissions from all coatings and any added solvent(s) applied, in pounds per month (the summation of: (all "d"));

9.f the solids content of each coating and any added solvent(s), in percent by volume;

9.g the amount of solids applied from each coating and any added solvent(s), in gallons per month ("c" x "f");

9.h the total solids applied from all coatings and any added solvent(s), in gallons per month (the summation of:(all "g"));

9.i the total organic HAP emissions, in pounds per rolling 12-month period (the summation of: (total organic HAP emitted for the current month ("e") plus the total amount of organic HAP emissions ("e") for the 11 previous calendar months));

9.j the total solids applied, in gallons per rolling 12-month period, (the summation of: (total solids applied for the current month ("h") plus the total amount of solids applied ("h") for the 11 previous calendar months));

9.k the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids, in pounds per gallon ("i" / "j"); and

9.l the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids, in kilograms per liter ("k" x 0.1198).

10. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, using only always-controlled work stations vented to the thermal oxidizer, the permittee shall calculate the organic HAP emission rate according to the requirement of 40 CFR Part 63, Subpart SSSS and shall maintain the following monthly information:

10.a the identification of each work station employed;

10.b the name and identification number of each coating and any added solvent(s) applied in each work station;

10.c the organic HAP content of each coating and any added solvent(s) applied, in pounds per gallon of coating, as applied;

10.d the total amount of each coating and any added solvent(s) applied in each work station, in gallons per month;

10.e the monthly organic HAP generated from all coatings and any added solvent(s) applied at each work station, in pounds per month, (the summation of all: ("c" x d"));

10.f the overall capture and control reduction for each work station, in percent reduced ((Percent capture for the specific work station) x(Percent reduced of the employed control device on the specific work station) / 100);

10.g the controlled organic HAP emissions from each work station, in pounds per month ["e" x (1-"f"/100)];

10.h the total controlled organic HAP emissions from all work stations, in pounds per month (the summation of: (all "g'));

10.i the solids content of each coating and any added solvent(s), in percent by volume;

10.j the amount of solids applied from each coating and any added solvent(s), in gallons per month ("d" x "i");

10.k the total solids applied from all coatings and any added solvent(s), in gallons per month (the summation of all "j");

III. Monitoring and/or Record Keeping Requirements (continued)

10.l the total organic HAP emissions, in pounds per rolling 12-month period (the summation of: (total organic HAP emitted for the current month ("h") plus the total amount of organic HAP emissions ("h") for the 11 previous calendar months));

10.m the total solids applied, in gallons, per rolling 12-month period (the summation of: (total solids applied for current month ("k") plus the total solids applied ("k") for 11 previous calendar months));

10.n the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids, in pounds per gallon ("l" / "m"); and

10.o the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids, in kilograms per liter ("n" x 0.1198).

11. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, using a combination of compliant coatings and use of the thermal oxidizer and maintaining an acceptable equivalent emission rate, the permittee shall the calculate the organic HAP emission rate according to the requirement of 40 CFR Part 63, Subpart SSSS and shall maintain the following monthly information:

11.a the total organic HAP emissions from the use of coatings and any added solvent(s) without the use of the control device to reduce the emissions, in pounds per month (See section A.III.9.e);

11.b the total solids applied from the use of coatings and any added solvent(s) without the use of the control device to reduce the emissions, in gallons per month (See section A.III.9.h);

11.c the total organic HAP emissions from the use of coatings and any added solvent(s) with the use of the control device to reduce the emissions, in pounds per month (See section A.III.10.h);

11.d the total solids applied from the use of coatings and any added solvent(s) with the use of the control device to reduce the emissions, in gallons per month (See section A.III.10.k);

11.e the total organic HAP emitted from all coatings and any added solvent(s) applied, in pounds per month ("a" + "c");

11.f the total solids applied from all coatings and any added solvent(s), in gallons per month ("b" + "d");

11.g the total organic HAP emissions, in pounds per rolling 12-month period (the summation of: (total organic HAP emitted for the current month ("e") plus the total amount of organic HAP emissions ("e") for the 11 previous calendar months));

11.h the total solids applied, in gallons per rolling 12-month period, (the summation of: (total solids applied for the current month ("f") plus the total amount of solids applied ("f") for the 11 previous calendar months));

11.i the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids, in pounds per gallon (("g" / "h")); and

11.j the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids, in kilograms per liter (("i" x 0.1198)).

12. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSce, the permittee shall calculate the overall organic HAP reduction efficiency according to the requirements of 40 CFR Part 63, Subpart SSSS, and shall maintain the following monthly information:

12.a the identification of each work station employed;

12.b the name and identification number of each coating and any added solvent(s) applied in each work station;

12.c the organic HAP content of each coating and any added solvent(s), in kilograms per liter of coating, as applied;

12.d the total amount of each coating and any added solvent(s) applied in each work station, in liters per month;

12.e the monthly organic HAP generated from all coatings and any added solvent(s) applied at each work station, in kilograms per month, (the summation of all ["c" x "d"]);

III. Monitoring and/or Record Keeping Requirements (continued)

12.f the overall capture and control reduction for each work station employed, in percent reduced ((Percent capture for the specific work station) x (Percent reduced of the control device on the specific work station) / 100);

12.g the monthly organic HAP destroyed by the control device at each work station employed, in kilograms per month ("e" x ("f" / 100);

12.h the monthly organic HAP destroyed by all control devices included in this determination, in kilograms per month (the combined total of all "g");

12.i the monthly organic HAP generated at all work stations included in this determination, in kilograms per month (the combined total of all "e"); and

12.j the overall HAP reduction efficiency for all work stations included in this determination (100 x {"h" / "i"}).

IV. Reporting Requirements

1. Pursuant to OAC rules 3745-21-09(B)(3(i) and (B)(3)(k), when demonstrating compliance with the daily volume-weighted average VOC limits according to OAC rule 3745-21-09(E), the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

2. Prsuant to OAC rule 3745-21-09(B)(3)(g), when demonstrating compliance through the use of complying coatings according to OAC rule 3745-21-09(E), the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

3. Pursuant to OAC rule 3745-21-09(B)(3)(m), the permittee shall submit quarterly summaries of the following records for all times when the thermal oxidizer is used to demonstrate compliance:

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

4. The permittee shall submit the reports specified in the following paragraphs to the Ohio EPA, Southwest District Office and U.S. EPA Region V per 40 CFR 63.5180.

4.a The permittee shall submit a Notification of Performance Test as specified in 40 CFR 63.7 and 63.9(e) if the permittee is complying with the emission standard using a control device. This notification and the site-specific test plan required under 40 CFR 63.7(c)(2) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The permittee may consider the operating parameter identified in the site-specific test plan to be approved unless explicitly disapproved, or unless comments received from the Administrator require monitoring of an alternate parameter.

4.b The permittee shall submit performance test reports as specified in 40 CFR 63.10(d)(2) if a control device is used to comply with 40 CFR 63, Subpart SSSS.

IV. Reporting Requirements (continued)

4.c The permittee shall submit start-up, shutdown, and malfunction reports as specified in 40 CFR 63.10(d)(5) if a control device is used to comply with 40 CFR 63, Subpart SSSS.

i. If actions during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's start-up, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the permittee shall state such information in the report. The start-up, shutdown, or malfunction report will consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy, that will be submitted to the Administrator.

ii. Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph A.IV.4.(d).

4.d The permittee shall submit semiannual compliance reports that cover the reporting period from January 1 through June 30 or from July 1 through December 31, as appropriate. Each report shall be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. The report shall contain the following information per 40 CFR 63.5180(g)(2) and 63.5180(h):

i. Company name and address.

ii. Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.

iii. Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

iv. Identification of the compliance option(s) specified in Table 1 of 40 CFR 63.5170 that the permittee used on each coating operation during the reporting period. If the permittee switched between SSSS-Option A and SSSS-Option B during the reporting period, the permittee must report the beginning dates for each compliance option.

v. A statement that there were no deviations from the standards during the reporting period.

vi. The total operating time of each affected source during the reporting period.

vii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable, and the corrective action taken.

viii. Information on the number, duration, and cause for monitor downtime incidents (including unknown cause other than downtime associated with zero and span and other daily calibration checks, if applicable).

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

VOC emissions shall not exceed 2.6 lbs/gallon of coating excluding water and exempt solvents, as the maximum VOC content of each coating or as a daily volume-weighted average; or 4.0 lbs/gallon of solids when using the thermal oxidizer.

or

The capture and control system shall provide not less than an 81 percent reduction, by weight, in the overall VOC emissions from the coating line and the reduction efficiency of the thermal oxidizer shall not be less than 90 percent, by weight, for the VOC emissions vented to it.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Sections A.III.1, 2, 3, & 4, of these terms and conditions

1.b Emission Limitation:

The permittee shall limit organic HAP emissions to no more than 0.046 kg/liter (0.38 lbs/gallon) of solids applied during each 12-month compliance period.

Applicable Compliance Method:

Compliance with this emission limitations shall be determined through the record keeping requirements based on the appropriate compliance protocol established in sections A.III.5 - 11

1.c Emission Limitation:

The permittee shall limit organic HAP emissions to no more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction).

Applicable Compliance Methods:

Compliance with this emission limitation shall be based upon the records required pursuant to sections A.III.22.

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

2.a The emission testing shall be conducted within 6 months prior to the expiration of this facility's Title V permit.

2.b The test(s) shall be conducted while the emissions units are operating at or near the maximum capacities for collected emissions from this emissions unit (K001), unless otherwise specified or approved by the Ohio EPA, Central District Office.

2.c The permittee shall conduct, or have conducted, a performance test for each capture and control system to determine the destruction or removal efficiency of each control device according to 40 CFR 63.5160(d) as described in section A.V.2.g, and the capture efficiency of each capture system according to 40 CFR 63.5160(e) as described in section A.V.2.h, , while burning natural gas in the curing ovens and collecting emissions from this emissions unit (K001).

2.d The permittee shall determine the organic HAP weight fraction of each coating material applied by following one of the procedures in accordance with 40 CFR 63.5160(b):

V. Testing Requirements (continued)

i. the permittee may test the material in accordance with Method 311 of appendix A of 40 CFR 63. The Method 311 determination may be performed by the manufacturer of the material and the results provided to the permittee.. The organic HAP content shall be calculated according to the following criteria and procedures:

(1) count only those organic HAP that are measured to be present at greater than or equal to 0.1 weight percent for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and greater than or equal to 1.0 weight percent for other organic HAP compounds;

(2) express the weight fraction of each organic HAP counted according to subparagraph (2). of this section as a value truncated to four places after the decimal point (for example, 0.3791); and

(3) calculate the total weight fraction of organic HAP in the tested material by summing the counted individual organic HAP weight fractions and truncating the result to three places after the decimal point (for example, 0.763);

ii. for coatings, the permittee may determine the total volatile matter content as weight fraction of non-aqueous volatile matter and use it as a substitute for organic HAP, using Method 24 of 40 CFR 60, appendix A. The Method 24 determination may be performed by the manufacturer of the coating and the results provided to the permittee;

iii. the permittee may use an alternative test method for determining the organic HAP weight fraction once the Administrator has approved it. The permittee shall follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval; and

iv. the permittee may use formulation data provided that the information represents each organic HAP present at a level equal to or greater than 0.1 percent for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and equal to or greater than 1.0 percent for other organic HAP compounds in any raw material used, weighted by the mass fraction of each raw material used in the material. Formulation data may be provided by the manufacturer of the coating material. In the event of any inconsistency between test data obtained with the test methods specified in paragraphs (i) through (iii) of term A.V.2.e and formulation data, the test data will govern.

2.e Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings.

2.f In accordance with 40 CFR 63.5160(c), the permittee shall determine the solids content of each coating material applied. The permittee may determine the volume solids content using ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 (incorporated by reference, see 40 CFR 63.14), or an EPA approved alternative method. The ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 determination may be performed by the manufacturer of the material and the results provided to the permittee. Alternatively, the permittee may rely on formulation data provided by material providers to determine the volume solids.

2.g The permittee shall conduct, or have conducted, a performance test to establish the destruction or removal efficiency of the control device or the outlet VOC concentration achieved by the oxidizer, according to the methods and procedures in Methods 1 through 4 and 25 or 25A, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

V. Testing Requirements (continued)

2.h The permittee shall determine the capture efficiency of the enclosure on the coating operation by one of the following procedures:

i. for an enclosure that meets the criteria for a PTE, the permittee may assume it achieves 100 percent capture efficiency. The permittee must confirm that the capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40 CFR 51, Appendix M (or an EPA approved alternative method), and that all exhaust gases from the enclosure are delivered to a control device;

ii. the permittee may determine capture efficiency, CE, according to the protocols for testing with temporary total enclosures that are specified in Method 204A through F of 40 CFR 51, Appendix M. The permittee may exclude never-controlled work stations from such capture efficiency determinations; and

iii. as an alternative to the procedures specified in paragraphs (h)(i) and (ii) of this section, if a capture efficiency test is required, the permittee may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective or the Lower Confidence Limit approach as described in Appendix A to 40 CFR 63, Subpart KK. The permittee may exclude never-controlled work stations from such capture efficiency determinations.

2.i During the performance test specified in paragraph (g) of this section, the permittee shall monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. The permittee shall monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs. The permittee shall use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for the thermal oxidizer for purposes of 40 CFR Part 63, Subpart SSSS.

3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 54" Coil Coating Line (K002)

Activity Description: Coil Coating Line with wet section, pretreatment coater/oven, coater room air makeup unit, primer coater/oven/quench, finish coater/oven/quench, regenerative thermal oxidizer.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
(K002) - 54 inch Coil Coating Line with pretreat coater and curing ovens controlled with a thermal incinerator	OAC rule 3745-31-05(A)(3) and PTI 05-14417	Emissions from natural gas and/or propane combustion in the air make-up units, oven burners, pretreat oven burners, and thermal oxidizer shall not exceed 3.27 lbs NOx/hr and 5.14 lbs CO/hr. Volatile organic compound (VOC) emissions from the coating operation, including solvent cleanup activities, shall not exceed 425.51 tons per rolling 12-month period. Carbon monoxide (CO) emissions from from this emissions unit, shall not exceed 27.71 tons per rolling 12-month period, including the CO generated by the combustion of the VOC's generated in the coating operations and combusted in the thermal incinerator. Nitrogen Oxide (NOX) emissions from this emissions unit, shall not exceed 78.39 tons per rolling 12-month period, including the NOx generated by the combustion of the VOC's generated in the coating operations and combusted in the thermal incinerator. This emissions unit shall be equipped with a thermal oxidizer that can be employed in order to assure compliance with applicable State and Federal air pollution rules and regulations, which constitutes BAT for this emissions unit.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-09(E) and OAC rule 3745-21-09(B)(6)	See Sections A. 2 e. When the capture and control system is not employed, VOC emissions shall not exceed 2.6 lbs/gallon of coating excluding water and exempt solvents, as the maximum VOC content of each coating or as a daily volume-weighted average; or when the capture and control system is employed, VOC emissions shall not exceed 4.0 lbs/gallon of solids as the maximum VOC emission rate of each coating, or as a daily volume-weighted average; or in lieu of OAC rule 3745-21-09(E) requirements, the capture and control system shall provide not less than an 81 percent reduction, by weight, in the overall VOC emissions from the coating line and the reduction efficiency of the thermal oxidizer shall not be less than 90 percent, by weight, for the VOC emissions vented to it.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR Part 60, Subpart TT	Compliance Option TTn: VOC emissions shall not exceed 0.28 kg/liter (2.34 lb/gal) of coating solids applied for each calender month without the use of the thermal oxidizer. Compliance Option TTc: VOC emissions shall not exceed 0.14 kg/liter (1.17 lbs/gal) of coating solids applied for each calendar month with the use of the thermal oxidizer. Compliance Option TTce: VOC emissions (stack and fugitive) shall not exceed 10 percent of the VOC's applied for each calendar month. Compliance Option TTi: VOC emissions shall not exceed a value between 0.14 (or a 90-percent emission reduction) and 0.28 kg/liter (between 1.17 and 2.34 lb/gal) of coating solids applied for each calender month with intermittent use of the thermal oxidizer. See section A.I.2.b below
	40 CFR Part 63, Subpart SSSS	Compliance Option SSSSe: Organic HAP emissions shall not exceed 0.046 kg/liter (0.38 lbs/gallon) of solids applied during each rolling 12-month compliance period. Compliance Option SSSSce: Organic HAP emissions (stack and fugitive) shall not exceed 2 percent of the organic HAP applied during each rolling 12-month compliance period (98 percent reduction). See section A.I.2.b through d.
	OAC rule 3745-31-05(A)(3)(b)	See section A.2.e.
	OAC rule 3745-17-10	See Section A.I.2.f.
	OAC rule 3745-17-07(A)	See Section A.I.2.h.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See Section A.3 under the Facility Terms/Conditions.
	OAC rule 3745-17-11	See Section A.I.2.g.

2. Additional Terms and Conditions

2.a The emission limitations for hourly NOx and CO from natural gas and propane combustion in the air make-up units, oven burners, pretreat oven burners, and thermal oxidizer were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, establishing record keeping and reporting requirements to ensure compliance with these limitations is not necessary.

2.b The permittee shall employ all of the associated monitoring, record keeping, reporting and testing methods required by this permit at all times for the compliance options that are being used to determine compliance for 40 CFR 60, Subpart TT, and 40 CFR 63, Subpart SSSS.

2.c Compliance with the compliance options established pursuant to 40 CFR Part 63, Subpart SSSS may be demonstrated for each individual coating line, to multiple lines as a group, or to the entire affected source.

2.d Compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, shall be demonstrated by use of:

i. "as purchased" compliant coatings;
ii. "as applied" compliant coatings;
iii. using only always-controlled work stations vented to the thermal oxidizer; or
iv. a combination of compliant coatings and use of the thermal oxidizer and maintaining an acceptable equivalent emission rate.

2.e The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) and SO2 emissions from this emissions unit since the potential emissions are less than ten tons per year.

2.f OAC rule 3745-17-10 regulates in-direct heat transfer fuel burning equipment. Since this emissions unit is direct heat transfer fuel burning equipment, the requirements of OAC rule 3745-17-10 do not apply.

2.g The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11, does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14), means the total weight of all materials introduced into the source operation, including solid fuels, but excluding gaseous fuels and liquid fuels when they are used solely as fuels, and excluding air introduced for the purpose of combustion.

* The burning of natural gas or propanr is the only source of PE from this emissions unit.

2.h This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), purusant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rules 3745-17-08, 3745-17-09, 3745-17-10, or 3745-17-11.

II. Operational Restrictions

1. Per 40 CFR 60.464(c), when the emission unit is operating and the thermal oxidizer is used to demonstrate compliance with compliance options TTc, TTce, or TTi, the permittee shall install, calibrate, operate, and maintain a device thar continuously records the combustion temperature of any effluent gases incinerated to achieve compliance. This device shall have an accuracy of + or - 2.5 degrees C. or + or - 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater.

2. When the emission unit is operating and the thermal oxidizer is used to demonstrate compliance with compliance options SSSSe or SSSSce, the emission capture system shall be operated and maintained according to the capture system monitoring plan required under 40 CFR 63.5150(a)(4).

II. Operational Restrictions (continued)

3. Pursuant to 40 CFR 63.5170(f)(1)(ix)(B), when the emissions unit is operating and the thermal oxidizer is used to demonstrate compliance with compliance options SSSSe or SSSSce, the control device efficiency shall be determined to be zero for each instance where the 3-hour block average thermal oxidizer combustion temperature falls below the average combustion temperature limit established during the most recent emission test that demonstrated the emissions unit was in compliance.

4. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, using only always-controlled work stations vented to the thermal oxidizer, the permittee shall continuously monitor the operating parameter established in accordance with 40 CFR 63.5150(a)(3).

5. When a control device is employed to demonstrate compliance with the emissions limitations of 40 CFR Part 63, Subpart SSSS, the permittee shall maintain a monitoring system, including any applicable records, that would demonstrate continuous compliance with the average operating parameter values as established in 40 CFR 63.5150(a)(3) for each 3-hour block period, each capture system operating parameter value as established in 40 CFR 63.5150(a)(4) for each 3-hour block period; and the appropriate organic HAP emission rate based on solids applied, as required by 40 CFR Part 63, Subpart SSSS.

6. When determining compliance with OAC rule 3745-21-09(E) by the use of the option provided in OAC rule 3745-21-09(B)(6), the permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the coating line is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

III. Monitoring and/or Record Keeping Requirements

1. For the purpose of determining rolling 12-month VOC emissions, the permittee shall maintain the following monthly records on all materials employed in this emissions unit that are not captured and routed to the thermal oxidizer:

1.a the name and identification number of each cleanup solvent employed;

1.b the volume, in gallons, of each cleanup solvent;

1.c the VOC content for each cleanup solvent, in pounds per gallon;

1.d the volume of waste cleanup solvents disposed of or reclaimed, in gallons;

1.e the VOC content of the waste cleanup solvents disposed of or reclaimed, in pounds per gallon;

1.f the VOC emissions from the use of cleanup solvents, in tons per month, (the summation of: {[("b" x "c") - ("d" x "e")]/ 2000 lbs/ton});

1.g the name and identification number of each coating employed;

1.h the volume of each coating employed, in gallons;

1.i the VOC content for each coating, in pounds per gallon; and

1.j the VOC emissions from the use of coatings that are not captured and routed to the thermal oxidizer, in tons per month, (the combined total of all: {["h" x "i"]/ 2000 lbs/ton}).

2. For the purpose of determining rolling 12-month VOC emissions, the permittee shall maintain the following monthly records on all materials employed in this emissions unit that are captured and routed to the thermal oxidizer:

2.a the name and identification number of each VOC containing cleanup solvent employed;

2.b the volume of cleanup solvents employed, in gallons;

III. Monitoring and/or Record Keeping Requirements (continued)

2.c the VOC content for each cleanup solvent, in pounds per gallon;

2.d the volume of waste cleanup solvents disposed of or reclaimed, in gallons;

2.e the VOC content of the waste cleanup solvents disposed of or reclaimed, in pounds per gallon;

2.f the total VOC generated from the use of cleanup solvents that are captured and routed to the thermal oxidizer, in tons per month (the combined total of all: {[("b" x "c") - ("d" x "e")]/ 2000 lbs/ton});

2.g the overall capture and control efficiency, in percent by weight (based on the results from the most recent stack test results);

2.h the total controlled VOC emissions from the use of cleanup solvents that are captured and routed to the thermal oxidizer, in tons per month ("f" x [1- "g"/100]);

2.i the name and identification number of each coating employed;

2.j the volume of each coating employed, in gallons;

2.k the VOC content for each coating, in pounds per gallon;

2.l the total VOC generated from the use of coatings that are captured and routed to the thermal oxidizer, in tons per month, (the combined total of all: {["j" x "k"]/ 2000 lbs/ton}); and

2.m the total controlled VOC emissions from the use of coatings that are captured and routed to the thermal oxidizer, in tons per month ("l" x [1- "g"/100]).

3. For the purpose of determining rolling 12-month VOC emissions, the permittee shall maintain the following monthly information:

3.a the total amount of VOC emissions from the use of cleanup solvents that are not captured and routed to the thermal oxidizer, in tons per month (See section A.III.1.f);

3.b the total amount of VOC emissions from the coatings employed that are not captured and routed to the thermal oxidizer, in tons per month (See section A.III.1.j);

3.c the total amount of VOC emissions from the use of cleanup solvents that are captured and routed to the thermal oxidizer, in tons per month (See section A.III.2.h);

3.d the total amount of VOC emissions from the coatings employed that are captured and routed to the thermal oxidizer, in tons per month (See section A.III.2.m);

3.e the total VOC emissions, in tons per month ("a" + "b" + "c" +"d"); and

3.f the total VOC emissions, in tons per rolling 12-month period (the summation of: the total VOC emissions for the current month ("e") plus the total VOC emissions ("e") for each of the 11 previous calendar months).

4. When complying with the 2.6 lbs/gallon, excluding water and exempt solvents, VOC emission limit per OAC rule 3745-21-09(E) through the use of complying coatings, the permittee shall collect and record the following daily information:

4.a the date the specific coating process was operated and not vented to the control device;

4.b the specific coating process that was operated without being vented to the control device;

4.c the name and identification number of each coating employed in the specific coating process; and

4.d the VOC content of each coating employed in the specific coating process, in pounds per gallon of coating, excluding water and exempt solvents.

5. When complying with the 2.6 lbs/gallon, excluding water and exempt solvents, VOC emission limit per OAC 3745 21-09(E) as a daily volume-weighted average:

III. Monitoring and/or Record Keeping Requirements (continued)

5.a the date the specific coating process was operated and not vented to the control device;

5.b the specific coating process that was operated without being vented to the control device;

5.c the name and identification number of each coating employed in the specific coating process;

5.d the VOC content of each coating employed in the specific coating process, in pounds per gallon of coating, excluding water and exempt solvents, as applied;

5.e the total amount of each coating employed in the specific coating process, in gallons per day, excluding water and exempt solvents, as applied;

5.f the total amount of all coatings employed, in gallons per day, excluding water and exempt solvents (the summation of: [the total of each coating employed ("e")]);

5.g the total amount of VOC emitted from the coatings employed, in pounds per day (the summation of: [the total of each ("d" x "e"]); and

5.h the daily volume weighted average VOC discharged from the coatings employed, in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied ("g"/"f").

6. When complying with the 4.0 lbs/gallon of solids VOC emission limit per OAC 3745-21-09(E), permittee shall collect and record the following monthly information:

6.a A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;

6.b All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

6.c the date the specific coating process was operated and vented to the control device;

6.d the specific coating process that was operated and vented to the control device;

6.e the name and identification number of each coating employed in the specific coating process;

6.f the VOC content of each coating employed in the specific coating process, in pounds per gallon of coating, as applied;

6.g the solids content of the each coating, in percent by volume;

6.h the total amount of each coating employed in the specific coating process, in gallons per day, as applied;

6.i the amount of solids applied from each coating employed, in gallons per day ("g" x "h").

6.j the total amount of solids applied, in gallons per day (the summation of: [all "i"]);

III. Monitoring and/or Record Keeping Requirements (continued)

6.k if demonstrating compliance based on the maximum VOC content of all coatings employed, in pounds per gallon of coating solids, as applied;

i. maximum VOC content of all coatings employed, in pounds per gallon of coating, as applied (the maximum of all "f");

ii. the amount of VOC generated from the coatings employed, in pounds per day ({the combined total of all "h"} x "k.i");

iii. the amount of VOC emitted from the coatings employed, in pounds per day ("k.ii" x {1-[overall removal efficiency of the capture and control system]}); and

iv. the calculated, controlled VOC emission rate, in pounds per gallon of coating solids, as applied ("k.iii" / "j").

6.l When demonstrating compliance based on the daily volume weighted average VOC content of all coating employed, in pounds per gallon of coating solids, as applied;

i. the amount of VOC generated from each coating employed, in pounds per day ("f" x "h");

ii. the total amount of VOC's generated, in pounds per day (the summation of: (all "l.i");

iii. the total amount of VOC discharged, in pounds per day, (the summation of: ["l.i" x (1- Overall removal efficiency of the capture and control system]); and

iv. the daily volume weighted average VOC discharged from the coatings employed, in pounds of VOC per gallon of solids applied, (the summation of: ("l.iii"/"j").

7. When determining compliance with OAC rule 3745-21-09(E) by the use of the 81% overall capture and control and 90% destruction efficiency requirements of OAC rule 3745-21-09(B)(6), the permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the line was operating and the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit (28 degrees C) below the average temperature during the most recent emissions test that demonstrated that the emission unit was in compliance.

b. A log of the operating time for the capture (collection) system, control device, and monitoring equipment, and when the associated emissions unit.

8. Until ten years after this emissions unit resumes regular operations following completion of the modifications that are covered under PTI # 05-14417, the permittee shall maintain the following monthly records on the overall volatile organic compound (VOC) emissions changes due to the specific modifications within this permit to this emissions unit and all secondary affected emissions units:

8.a the name and Ohio EPA identification of each affected emissions unit (affected emissions units are those emissions units that are modified as part of this permit to install or effectively "debottlenecked" to increase emissions);

8.b the physical change or change in the method of operation, due to the modifications in this permit to install (example: increased 30 hours of operations of a 10 MMBTU/hr natural gas-fired boiler per month (0.3 MM standard cubic feet of natural gas usage increase per month));

8.c the emissions factor employed and basis (example: 5.5 lbs of VOC/ MM standard cubic feet of natural gas fired, AP-42, Table 1.4-2);

8.d the calculated VOC emissions for each emissions unit affected by this permit to install, in tons per month (example:[(Actual Utilization x Emission Factor) / 2000 pounds per ton]);

8.e the actual VOC emissions from all emissions units affected by this permit to install, in tons per month (summation of all"d");

III. Monitoring and/or Record Keeping Requirements (continued)

8.f the total VOC emissions from all emissions units affected by this permit to install, in tons per rolling 12-month period (the summation of (total VOC emissions for the current month ("e") plus the total VOC emission ("e") for the 11 previous calendar months));

8.g the overall VOC emission increase resulting from this permit to install (("f") - [actual baseline emissions for 1998 and 1999}*).

* The VOC baseline emissions are established on the 24 month operational period of Jan.1, 1998 through Dec. 31, 1999. Based on this facilities Title V emission fee report, the overall combined 24 month VOC emissions from emissions units B009, B010, K001, K002, and P010, was 485.37 tons, which gives an annualized based line VOC emission of 242.69 tons. With the permittee's requested 37.65 tons of VOC per rolling 12-month period, Actual Projected Maximum Increase, the OAC rule 3745-31-10(C)(3) allowable VOC for the ten years following the return to normal operations will be 280.34 tons per rolling 12-month period.

9. Until ten years after this emissions unit resumes regular operations following the completion of the modifications that are covered under PTI #05-14417, the permittee shall maintain the following monthly records on the overall nitrogen oxides (NOx) emissions changes due to the specific modifications within this permit to this emissions unit and all secondary affected emissions units:

9.a the name and Ohio EPA identification of each affected emissions unit (affected emissions units are those emissions units that are modified as part of this permit to install or effectively "debottlenecked" to increase emissions);

9.b the physical change or change in the method of operation, due to the modifications in this permit to install (example: increased 30 hours of operations of a 10 MMBTU/hr natural gas-fired boiler per month (0.3 MM standard cubic feet of natural gas usage increase per month));

9.c the emissions factor employed and basis (example: 100 lbs of NOx/ MM standard cubic feet of natural gas fired, AP-42, Table 1.4-1);

9.d the calculated NOx emissions for each emissions unit affected by this permit to install, in tons per month (example: [Actual Utilization x Emission Factor] / 2000 pounds per ton);

9.e the calculated NOx emissions resulting from combustion of VOC's in the thermal incinerator(s) associated with each emissions unit affected by this permit to install, in tons per month;

9.f the actual NOx emissions from all emissions units affected by this permit to install, in tons per month (summation of all (("d") + ("e"));

9.g the total NOx emissions from all emissions units affected by this permit to install, in tons per rolling 12-month period (the summation of (total NOx emissions for the current month ("f") plus the total NOx emissions ("f") for the 11 previous calendar months)); and

9.h the overall NOx emission increase resulting from this permit to install (("g") - [actual baseline emissions for 1998 and 1999]*)

* The NOx baseline emissions are established on the 24 month operational period of Jan.1, 1998 through Dec. 31, 1999. Based on this facilities Title V emission fee report, the overall combined 24 month NOx emissions from emissions units B009, B010, K001, K002, and P010, was 37.85 tons, which gives an annualized based line NOx emission of 18.93 tons. With the permittee's requested 21.50 tons of NOx per rolling 12-month period, Actual Projected Maximum Increase, the OAC rule 3745-31-10(C)(3) allowable NOx for the ten years following the return to normal operations will be 40.43 tons per rolling 12-month period.

10. When complying with 40 CFR 60, Subpart TT, Option TTn or TTc, the permittee shall collect and record the following monthly information:

10.a the name and identification number of each coating and VOC solvent employed in the specific coating process;

10.b density of each coating and VOC solvent, as received, in kilograms per liter;

10.c the proportion of VOC's in each coating and VOC solvent, as received, in percent by weight;

III. Monitoring and/or Record Keeping Requirements (continued)

10.d the solids content of each coating employed, as received, in percent by volume;

10.e the volume of each coating and VOC solvent applied, as received, in liters;

10.f the total VOC generated from the use of coating and VOC solvent in kilograms per month (the combined total of all {"b" x "c" x "e"});

10.g the total amount of solids applied, in liters (the combined total of all {"d" x "e"});

10.h if the control device was not employed during the month, the monthly volume weighted average VOC content of the coating employed, in kilograms per liter of applied solids ("f" / "g"); and

10.i if the control device was employed during the month,

i. the overall capture and control efficiency, in percent by weight (based on the results from the most recent stack test results);

ii. the monthly volume weighted average VOC emissions of the coating employed, in kilograms per liter of applied solids ("h" x {1 - "i.i"/100}).

11. When complying with 40 CFR 60, Subpart TT, Option TTi, the permittee shall collect and record the following monthly information:

11.a the name and identification number of each coating and VOC solvent employed in the specific coating process;

11.b density of each coating and VOC solvent, as received, in kilograms per liter;

11.c the proportion of VOC's in each coating and VOC solvent, as received, in percent by weight;

11.d the solids content of each coating employed, as received, in percent by volume;

11.e the volume of each coating and VOC solvent applied when the control device was not employed, as received, in liters;

11.f the volume of each coating and VOC solvent applied when the control device was employed, as received, in liters;

11.g the total VOC generated from the use of coating and VOC solvent when the control device was not employed, in kilograms per month (the combined total of all {"b" x "c" x "e"});

11.h the total VOC generated from the use of coating and VOC solvent when the control device was employed, in kilograms per month (the combined total of all {"b" x "c" x "f"});

11.i the total amount of solids applied with the control device was not employed, in liters (the combined total of all {"d" x "e"});

11.j the total amount of solids applied with the control device was employed, in liters (the combined total of all {"d" x "f"});

11.k the monthly volume weighted average VOC content of the coating employed when the control device was not employed, in kilograms per liter of applied solids ("g" / "i");

11.l the monthly volume weighted average VOC content of the coating employed when the control device was employed, in kilograms per liter of applied solids ("h" / "j");

11.m the overall capture and control efficiency, in percent by weight (based on the results from the most recent stack test results);

11.n the total overall monthly volume weighted average VOC emission of all coatings employed, in kilograms per liter of applied solids (["g" + ("h" x [1-("m"/100)])] / ["i" +'j"]); and

III. Monitoring and/or Record Keeping Requirements (continued)

11.o the total overall monthly volume weighted average VOC emission limit(s) for all coatings employed, in kilograms per liter of applied solids (S)

where:

S = ({0.28 x "i"} + {0.1 x "h"}) / ("i" + "j"), or

or

S = ({0.28 x "i"} + {0.14 x "j"}) / ("i" + "j")

whichever is greater.

12. When complying with 40 CFR 60, Subpart TT, Option TTce, the permittee shall collect and record the following monthly information:

a. the fraction of total VOC's emitted that enter the control device using Equation 5 in 40 CFR 60.463;

b. the destruction efficiency of the control device using Equation 6 in 40 CFR 60.463; and

c. the overall reduction efficiency ("a" x "b").

13. When determining compliance with 40 CFR Part 60, Subpart TT using continuous or intermittent use of the thermal oxidizer, the permittee shall record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in the thermal oxidizer used to control emissions from an affected facility remains more than 28°C (50°F) below the temperature at which compliance with 40 CFR Part 60, Subpart TT was demonstrated during the most recent measurement of oxidizer efficiency required by 40 CFR 60.8. The records required by 40 CFR 60.7 shall identify each such occurrence and its duration.

14. Pursuant to 40 CFR 60.465(e), the permittee shall maintain the following records for a period of at least two years:

a. all data and calculations used to determine monthly VOC emissions;

b. all data and calculations used to determine the monthly VOC emissions limit, where applicable; and

c. daily records of the thermal oxidizer combustion temperature, where compliance is achieved through the use of the thermal oxidizer.

15. When determining compliance with 40 CFR Part 63, Subpart SSSS using continuous or intermittent use of the thermal oxidizer, the permittee shall install, operate, monitor and inspect each monitoring, capture and control device as described below to comply with 40 CFR Part 63, Subpart SSSS:

15.a Temperature monitoring of oxidizer per 40 CFR 63.5150(a)(3) and Table 1 to 40 CFR Part 63, Subpart SSSS. The permittee shall comply with the following:

i. install , calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every 3 months; or the chart recorder, data logger, or temperature indicator shall be replaced. The permittee shall replace the equipment either if the permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly. Each temperature monitoring device shall be equipped with a continuous recorder. The device shall have an accuracy of ±1 percent of the temperature being monitored in degrees Celsius, or ±1 degrees Celsius, whichever is greater;

ii. install the thermocouple or temperature sensor in the combustion chamber at a location in the combustion zone; and

iii. reduce the data to 3-hour block averages.

III. Monitoring and/or Record Keeping Requirements (continued)

15.b Capture system monitoring per 40 CFR 63.5150(a)(4). The permittee shall develop a capture system monitoring plan containing the information specified in paragraphs (i.) and (ii.) of this section. The permittee shall monitor the capture system in accordance with paragraph (iii.) of this section. The permittee shall make the monitoring plan available for inspection by the permitting authority upon request.

i. The monitoring plan shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures.

ii. The plan also shall specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with the standards in sections A.I.1 and A.I.2. The operating limits shall represent the conditions indicative of proper operation and maintenance of the capture system.

iii. The permittee shall conduct monitoring in accordance with the plan.

16. Pursuant to 40 CFR 63.5190(a)(1), the permittee shall maintain records on which 40 CFR Part 63, Subpart SSSS compliance option was used and the time periods (beginning and ending dates and times) each option was used on K002.

17. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, using coatings that individually meet the organic HAP emission limits as-purchased, to which the permittee will not add HAP during distribution or application, the permittee shall calculate the following:

a. The as-purchased, organic HAP to solids ratio of coating material for each coating material applied (Hp) during the 12-month period using the following equation:

Hp = (Chi x Di) / Vsi

where:

Hp = the hazardous air pollutant to solids ratio of the coating materials, as purchased;
Chi = organic HAP content of coating material (kg/kg);
Di = density of coating material (kg/l); and
Vsi = volume fraction of solids in coating (l/l).

b. The affected source is in compliance if the as-purchased organic HAP to solids ratio of coating material for each coating material applied (Hp) during the 12-month period is less than or equal to 0.046 kg/l of solids applied.

18. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, using "as-applied" compliant coatings, based on the average organic HAP content on the basis of solids applied for each coating material applied, during the 12-month period, the permittee shall determine the organic HAP emission rate according to the requirements of 40 CFR Part 63, Subpart SSSS and shall maintain the following monthly information:

18.a the name and identification number of each coating and any added solvent(s) applied;

18.b the organic HAP content of each coating and any added solvent(s) , in pounds per gallon of coating, as applied;

18.c the total amount of each coating and any added solvent(s) applied, in gallons per month;

18.d the monthly organic HAP emissions from each coating and any added solvent(s) applied, in pounds per month ("b" x c");

18.e the solids content of each coating and any added solvent(s), in percent by volume;

18.f the amount of solids applied from each coating and any added solvent(s), in gallons per month ("c" x "e");

III. Monitoring and/or Record Keeping Requirements (continued)

18.g the total organic HAP emissions from each coating and any added solvent(s), in pounds per rolling 12-month period (the summation of: (total organic HAP emitted for the current month ("d") plus the total amount of organic HAP emissions ("d") for the 11 previous calendar months));

18.h the total solids applied from each coating and any added solvent(s), in gallons per rolling 12-month period, (the summation of: (total solids applied for the current month ("f") plus the total amount of solids applied ("f") for the 11 previous calendar months));

18.i the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids for each coating and any added solvent(s), in pounds per gallon ("g"/"h"); and

18.j the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids for each coating and any added solvent(s), in kilograms per liter ("i" x 0.1198).

19. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, using "as-applied" compliant coatings, based on the average organic HAP content on the basis of solids applied of all coating materials applied, the permittee shall calculate the organic HAP emission rate according to the requirement of 40 CFR Part 63, Subpart SSSS and shall maintain the following monthly information:

19.a the name and identification number of each coating and any added solvent(s) applied;

19.b the organic HAP content of each coating and any added solvent(s), in pounds per gallon of coating, as applied;

19.c the total amount of each coating and any added solvent(s) applied, in gallons per month;

19.d the monthly organic HAP emissions from each coating and any added solvent(s) applied, in pounds per month ("b" x c");

19.e the total organic HAP emissions from all coatings and any added solvent(s) applied, in pounds per month (the summation of: (all "d"));

19.f the solids content of each coating and any added solvent(s), in percent by volume;

19.g the amount of solids applied from each coating and solvent any added solvent(s), in gallons per month ("c" x "f");

19.h the total solids applied from all coatings and any added solvent(s), in gallons per month (the summation of: (all "g"));

19.i the total organic HAP emissions, in pounds per rolling 12-month period, (the summation of: (total organic HAP emitted for the current month ("e") plus the total amount of organic HAP emissions ("e") for the 11 previous calendar months));

19.j the total solids applied, in gallons per rolling 12-month period (the summation of: (total solids applied for the current month ("h") plus the total amount of solids applied ("h") for the 11 previous calendar months));

19.k the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids, in pounds per gallon ("i" / "j"); and

19.l the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids, in kilograms per liter ("k" x 0.1198).

20. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, using only always-controlled work stations vented to the thermal oxidizer, the permittee shall calculate the organic HAP emission rate according to the requirement of 40 CFR Part 63, Subpart SSSS and shall maintain the following monthly information:

20.a the identification of each work station employed;

20.b the name and identification number of each coating and any added solvent(s) applied in each work station;

III. Monitoring and/or Record Keeping Requirements (continued)

20.c the organic HAP content of each coating and any added solvent(s), in pounds per gallon of coating, as applied;

20.d the total amount of each coating and any added solvent(s) applied in each work station, in gallons per month;

20.e the monthly organic HAP generated from all coatings and any added solvent(s) applied at each work station, in pounds per month, (the summation of: all ("c" x d");

20.f the overall capture and control reduction for each work station, in percent reduced ([Percent capture for the specific work station] x ([Percent reduced of the employed control device on the specific work station] / 100));

20.g the controlled organic HAP emissions from each work station, in pounds per month ("e" x [1-"f"/100]);

20.h the total controlled organic HAP emissions from all work stations, in pounds per month (the summation of: [all "g"]);

20.i the solids content of each coating and any added solvent(s), in percent by volume;

20.j the amount of solids applied from each coating and any added solvent(s), in gallons per month ("d" x "i");

20.k the total solids applied from all coating and any added solvent(s), in gallons per month (the summation of: [all "j"]);

20.l the total organic HAP emissions, in pounds per rolling 12-month period, (the summation of: (total organic HAP emitted for the current month ("h") plus the total amount of organic HAP emissions ("h") for the 11 previous calendar months));

20.m the total solids applied, in gallons per rolling 12-month period, (the summation of: (total solids applied for the current month ("k") plus the total solids applied ("k") for the 11 previous calendar months));

20.n the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids, in pounds per gallon ("l" / "m"); and

20.o the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids, in kilograms per liter ("n" x 0.1198).

21. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, using a combination of compliant coatings and use of the thermal oxidizer and maintaining an acceptable equivalent emission rate, the permittee shall the calculate the organic HAP emission rate according to the requirement of 40 CFR Part 63, Subpart SSSS and shall maintain the following monthly information:

21.a the total organic HAP emissions from the use of coatings and any added solvent(s) without the use of the control device to reduce the emissions, in pounds per month (See section A.III.19.e);

21.b the total solids applied from the use of coatings and any added solvent(s) without the use of the control device to reduce the emissions, in gallons per month (See section A.III.19.h);

21.c the total organic HAP emissions from the use of coatings and any added solvent(s) with the use of the control device to reduce the emissions, in pounds per month (See section A.III.20.h);

21.d the total solids applied from the use of coatings and any added solvent(s) with the use of the control device to reduce the emissions, in gallons per month (See section A.III.20.k);

21.e the total organic HAP emitted from all coatings and any added solvent(s) applied, in pounds per month ("a" + "c");

21.f the total solids applied from all coatings and any added solvent(s) employed, in gallons per month ("b" + "d");

21.g the total organic HAP emissions, in pounds per rolling 12-month period (the summation of: (total organic HAP emitted for the current month ("e") plus the total amount of organic HAP emissions ("e") for the 11 previous calendar months));

21.h the total solids applied, in gallons per rolling 12-month period, (the summation of: (total solids applied for the current month ("f") plus the total amount of solids applied ("f") for the 11 previous calendar months));

III. Monitoring and/or Record Keeping Requirements (continued)

21.i the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids, in pounds per gallon (("g" / "h")); and

21.j the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids, in kilograms per liter (("i" x 0.1198)).

22. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSce, the permittee shall calculate the overall organic HAP reduction efficiency according to the requirements of 40 CFR Part 63, Subpart SSSS, and shall maintain the following monthly information:

22.a the identification of each work station employed;

22.b the name and identification number of each coating and any added solvent(s) applied in each work station;

22.c the organic HAP content of each coating and any added solvent(s), in kilograms per liter of coating, as applied;

22.d the total amount of each coating and any added solvent(s) applied in each work station, in liters per month;

22.e the monthly organic HAP generated from all coatings and any added solvent(s) applied at each work station, in kilograms per month, (the summation of all ["c" x "d"]);

22.f the overall capture and control reduction for each work station employed, in percent reduced ((Percent capture for the specific work station) x (Percent reduced of the control device on the specific work station) / 100);

22.g the monthly organic HAP destroyed by the control device at each work station employed, in kilograms per month ("e" x ("f" / 100);

22.h the monthly organic HAP destroyed by all control devices included in this determination, in kilograms per month (the combined total of all "g");

22.i the monthly organic HAP generated at all work stations included in this determination, in kilograms per month (the total of all "e"); and

22.j the overall HAP reduction efficiency for all work station included in this determination (100 x ["h" / "i"]).

23. The permittee shall maintain the following monthly information on the amount of NOx emitted from this emissions unit including emissions from combustion of fuel and VOC:

23.a the amount of natural gas/propane employed in the air make up unit, oven burners, pretreat oven burners, and the thermal oxidizer, each;

23.b the calculated monthly emissions of NOx from the fuel combusted in the air make up unit, oven burners, pretreat oven burners, and the thermal oxidizer, based on the appropriate emission factors from AP-42 or other established and verifiable sources*;

23.c the total VOC combusted in the thermal oxidizer, in pounds;

23.d the emissions of NOx generated by the combustion of VOCs ("c" x Gross Heat Value of VOCs (btu/lb) x NOx emission factor from AP-42, Chapter 1.4, "Natural Gas Combustion", Table 1.4-1, for uncontrolled small boilers;

23.e the emissions of NOx generated by the conversion of nitrogen in the VOCs combusted ("c" x weight fraction of nitrogen in the formulation (lbs N per pound VOC) x 3.285 (lbs NOx generated per pound of N combusted));

23.f the monthly emissions of NOx from the combustion of fuels and VOC's, in tons per month; ([b+d+e]/ 2000 pounds/ton); and

III. Monitoring and/or Record Keeping Requirements (continued)

23.g the total emissions of NOx, in tons per rolling 12-month period, (the summation of: (amount emitted, in tons, for the current month ("f") plus the total amount of NOx emitted ("f") in the 11 previous calendar months)).

* Note: the NOx from fuel combustion is based on the following emission factors: for the Air Makeup unit, 100 lbs/MM scf of natural gas burned or 19 lbs/ 1,000 gallons of propane burned; each Drying oven, 0.024 lbs/MM BTU of heat input; Pretreat Oven, 0.1 lbs/MM BTU heat input; and Thermal Oxdizer, 0.08 lbs/MM BTU of heat input.

24. The permittee shall maintain the following monthly information on the amount of CO emitted from this emissions unit including emissions from combustion of fuel and VOC:

24.a the amount of natural gas/propane employed in the air make up unit, oven burners, pretreat oven burners, and the thermal oxidizer, each;

24.b the calculated monthly emissions of CO from the fuel combusted in the air make up unit, oven burners, pretreat oven burners, and the thermal oxidizer, based on the appropriate emission factors from AP-42 or other established and verifiable sources*;

24.c the amount of VOC combusted in the thermal oxidizer, in pounds;

24.d the gross heat value of the VOC's combusted in the thermal oxidizer, in British thermal units (BTU's) per lb of VOC;

24.e the calculated monthly emissions of CO, based on the total amount of VOC combusted in the thermal oxidizer, the gross heating value, and the emissions factors from AP-42, Chapter 1.4, "Natural Gas Combustion", Table 1.4-1, for uncontrolled small boilers, and Table 1.4-2 ("c" x "d" x "emission factor");

24.f The monthly emissions of CO from the combustion of fuels and VOC's, in tons per month (["b" + "e"]/ 2000 ponds per ton); and

24.g the total emissions of CO, in tons per rolling 12-month period, (the summation of: (amount emitted, in tons, for the current month ("f") plus the total amount of CO emitted ("f") in the 11 previous calendar months)).

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. Volatile organic compound (VOC) emissions from the coating operation, including solvent cleanup activities, exceed 425.51 tons per rolling 12-month period;

b. Carbon monoxide (CO) emissions from this emissions unit exceed 27.71 tons per rolling 12-month period; and

c. Nitrogen oxides (NOx) emissions from this emissions unit exceed 78.39 tons per rolling 12-month period.

2. Pursuant to OAC rules 3745-21-09(B)(3)(i) and (B)(3)(k), when demonstrating compliance with the daily volume-weighted average VOC limits according to OAC rule 3745-21-09(E), the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

3. Pursuant to OAC rules 3745-21-09(B)(3)(g), when demonstrating compliance through the use of complying coatings according to OAC rule 3745-21-09(E), the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

IV. Reporting Requirements (continued)

4. Until ten years after this emissions unit resumes regular operations following completion of the modifications covered under PTI# 05-14417, the permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. A NOx emissions increase from all affected emissions units that equals or exceeds 40.00 tons per rolling 12-month period, as compared to the baseline NOx emissions as established during the 1998 and 1999 operational years.

b. A VOC emissions increase from all affected emissions units that equals or exceeds 40.00 tons per rolling 12-month period, as compared to the baseline VOC emissions as established during the 1998 and 1999 operational years.

5. Pursuant to OAC rule 3745-21-09(B)(3)(m), the permittee shall submit quarterly summaries of the following records for all times when the thermal oxidizer is used to demonstrate compliance:

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

6. When determining compliance with 40 CFR Part 60, Subpart TT using Option TTn, Option TTc, or Option TTi:

a. the permittee shall, following the initial performance test, record, and submit a written report to the Administrator every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under 40 CFR 60.462(a)(2). If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually; and

b. the permittee shall include in the initial compliance report required by 40 CFR 60.8 the weighted average of the VOC content of coatings used during a period of one calendar month for each affected facility per 40 CFR 60.465(a).

7. When determining compliance with 40 CFR Part 60, Subpart TT using Option TTc, Option TTce, or Option TTi::

7.a The permittee shall include the following data in the initial compliance report required by 40 CFR 60.8 per 40 CFR 60.465(b):

i. the overall VOC destruction rate used to attain compliance with 40 CFR 60.462(a)(2) or (a)(3); and

ii. the combustion temperature of the thermal incinerator used to attain compliance with 40 CFR 60.462(a)(2) or (a)(3).

7.b the permittee shall submit reports semiannually as specified in 40 CFR 60.7(c) (or more frequently if the Administrator, on a case-by-case basis, has determined that more frequent reporting is necessary to accurately assess the compliance status of the source) when the thermal oxidizer temperature drops as defined under 40 CFR 60.464(c). If no such periods occur, the owner or operator shall state this in the report.

8. The permittee shall submit the reports specified in the following paragraphs to the Ohio EPA, Southwest District Office and U.S. EPA Region V per 40 CFR 63.5180:

IV. Reporting Requirements (continued)

8.a The permittee shall submit a Notification of Performance Test as specified in 40 CFR 63.7 and 63.9(e) if the permittee is complying with the emission standard using a control device. This notification and the site-specific test plan required under 40 CFR 63.7(c)(2) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The permittee may consider the operating parameter identified in the site-specific test plan to be approved unless explicitly disapproved, or unless comments received from the Administrator require monitoring of an alternate parameter.

8.b The permittee shall submit performance test reports as specified in 40 CFR 63.10(d)(2) if a control device is used to comply with 40 CFR 63 Subpart SSSS.

8.c The permittee shall submit start-up, shutdown, and malfunction reports as specified in 40 CFR 63.10(d)(5) if a control device is used to comply with 40 CFR 63, Subpart SSSS.

i. If actions during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's start-up, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the permittee shall state such information in the report. The start-up, shutdown, or malfunction report will consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy, that will be submitted to the Administrator.

ii. Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph A.IV.8.(d).

8.d The permittee shall submit semi-annual compliance reports that cover the reporting period from January 1 through June 30 or from July 1 through December 31, as appropriate. Each report shall be postmarked or delivered no later than July 31 or January 31, whichever date is first date following the end of the semiannual reporting period. The report shall contain the following information per 40 CFR 63.5180(g)(2) and 63.5180(h):

i. Company name and address.

ii. Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.

iii. Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

iv. Identification of the compliance option(s) specified in Table 1 of 40 CFR 63.5170 that the permittee used on each coating operation during the reporting period. If the permittee switched between SSSS-Option A and SSSS-Option B during the reporting period, the permittee must report the beginning dates for each compliance option.

v. A statement that there were no deviations from the standards during the reporting period.

vi. The total operating time of each affected source during the reporting period.

vii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable, and the corrective action taken.

viii. Information on the number, duration, and cause for monitor downtime incidents (including unknown cause other than downtime associated with zero and span and other daily calibration checks, if applicable).

9. The permittee shall submit annual reports which specify the total organic compound, carbon monoxide, and nitrogen oxide emissions from this emissions unit. Annual emission reports may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations:

5.14 CO/hr, from the combustion of natural gas and/or propane.

The hourly allowable emission limitation for CO was established by multiplying the combined maximum natural gas usage rate (61,176 cu.ft/hr) by the CO emission factor from AP-42, Table 1.4-1, revised 7/98 (84 lbs CO/mm cu. ft)

Applicable Compliance:

Compliance with the above limitations is based on the maximum BTU value of each combustion unit and the emission rates as provided by Alcoa Home Exteriors in their PTI Application and Emissions Activity Category forms.

If required, compliance shall be determined through in accordance with 40 CFR Part 60, Appendix A, Method 1-4 and 10 for demonstrating compliance with the above CO emission rates.

1.b Emission Limitations:

27.7 tons of CO per rolling 12-month period, from the combustion of natural gas, propane, and VOC's.

The annual allowable emission limitation for CO was established by multiplying the maximum hourly emissions rate (5.14 lbs/hr) multiplied by 8760 hrs of operation. The CO created by the combustion of the VOC's vented to the thermal incinerator was also included.

*for the CO created by natural gas, propane, and VOC's combusted in this emissions unit see Section III.24.

Applicable Compliance:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections A.III.24, of this permit.

1.c Emission Limitations:

3.27 lbs of NOx per hour, from the combustion of natural gas and/or propane.

The hourly allowable emission limitation for NOX was established as follows:

(i) for the air make-up unit, 19 lbs NOX/ 10x 3 gals of Propane from AP-42, Table 1.5-1, dated 10-96;

(ii) for the oven burners, 24.5 lbs NOX/mm cu. ft. of natural gas from the vendor guarantee of 0.024 lbs NOX/MMBtu of actual heat input;

(iii) for the pretreat oven burners, 102 lbs NOX/mm cu. ft. of natural gas from the vendor guarantee of 0.1 lbs NOX/MMBtu of actual heat input, and

(iv) for the thermal oxidizer, 83.7 lbs NOX/mm cu. ft. of natural gas from the vendor guarantee of 0.08 lbs NOX/MMBtu of actual heat input.

V. Testing Requirements (continued)

The hourly NOx limitation from the combustion of fuel was established by the following equation:

HER = (Au x 19 lbs of NOx /1,000 gals of propane) + (Oh x 8 x 0.024 lbs of NOx/MMBTU) + (Ph x 0.1 lbs of NOx/MMBTU) + (Th x 0.08 lbs of NOx/MMBTU)

where:

HER = Hourly NOx Emission Rate, in lbs/hr;
Au = Maximum amount of propane usage, in 1000 gals/hr, (0.0552);
Oh = Maximum heat input of each oven burner, in MMBTU's/hr, (5.8, each, note there are a total of 8 burners in the prime and finish ovens);
Ph = Maximum heat input for the pretreat oven, in MMBTU/hr, (6.0); and
Th = Maximum heat input for the thermal oxidizer, in MMBTU/hr, (5.0).

Applicable Compliance:

Compliance with the above limitations is based on the maximum BTU value of each combustion unit and the emission rates as provided by Alcoa Home Exteriors in their PTI Application and Emissions Activity Category forms.

If required, compliance shall be determined through in accordance with 40 CFR Part 60, Appendix A, Method 1-4 and 7 for demonstrating compliance with the above NOx emission rates.

1.d Emission Limitations:

78.39 tons of NOx per rolling 12-month period, from the combustion of natural gas, propane, and VOC's.

The annual allowable emission limitation for NOX from combustion of natural gas and propane was established by multiplying the maximum hourly emissions rate (3.27 lbs/hr) by 8760 hrs of operation.

The NOx created by the combustion of the VOC's vented to the thermal incinerator was also included. The NOx emissions from the VOC combustion were established by:

(i) The projected total VOC combusted in the thermal oxidizer, in pounds;

(ii) The emissions of NOx generated by the combustion of VOCs ("i" x Gross Heat Value of VOCs (btu/lb) x NOx emission factor from AP-42, Chapter 1.4, "Natural Gas Combustion", Table 1.4-1, for uncontrolled small boilers; and

(iii) The emissions of NOx generated by the conversion of nitrogen in the VOCs combusted ("i" x weight fraction of nitrogen in the formulation (lbs N per pound VOC) x 3.285 (lbs NOx generated per pound of N combusted)).

Applicable Compliance:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections A.III.23, of this permit.

1.e Emission Limitation:

VOC emissions from the coating operation, including solvent cleanup activities, shall not exceed 425.51 tons per year.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.3, of these terms and conditions.

V. Testing Requirements (continued)

1.f Emission Limitation:

VOC emissions shall not exceed 2.6 lbs/gallon of coating excluding water and exempt solvents, as the maximum VOC content of each coating or as a daily volume-weighted average; or 4.0 lbs/gallon of solids when using the thermal oxidizer.

or

The capture and control system shall provide not less than an 81 percent reduction, by weight, in the overall VOC emissions from the coating line and the reduction efficiency of the thermal oxidizer shall not be less than 90 percent, by weight, for the VOC emissions vented to it.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Sections A.III.4, 5, 6, & 7, of these terms and conditions

1.g Emission Limitation:

VOC emissions shall not exceed 0.28 kg/liter (2.34 lb/gal) of coating solids applied for each calender month without the use of the thermal oxidizer or 0.14 kg/liter (1.17 lbs/gal) of coating solids applied for each calendar month with the use of the thermal oxidizer.

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the records required pursuant to sections A.III.10, 13, and 14, of these terms and conditions.

1.h Emission Limitation:

VOC emissions shall not exceed a value between 0.14 (or a 90-percent emission reduction) and 0.28 kg/liter (between 1.17 and 2.34 lb/gal) of coating solids applied for each calender month with intermittent use of the thermal oxidizer.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in sections A.III.11, 13, and 14.

1.i Emission Limitation:

VOC emissions shall not exceed 10 percent of the VOC's applied for each calendar month.

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the records required pursuant to section A.III.12, 13, and 14.

1.j Emission Limitation:

The permittee shall limit organic HAP emissions to no more than 0.046 kg/liter (0.38 lbs/gallon) of solids applied during each 12-month compliance period.

Applicable Compliance Method:

Compliance with this emission limitations shall be determined through the record keeping requirements based on the appropriate compliance protocol established in sections A.III.15 - 21

V. Testing Requirements (continued)

1.k Emission Limitation:

The permittee shall limit organic HAP emissions to no more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction).

Applicable Compliance Methods:

Compliance with this emission limitation shall be based upon the records required pursuant to sections A.III.15, 16, & 22.

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

2.a Consistent with U.S. EPA streamlining policy, the permittee may elect upon approval of Ohio EPA to utilize the applicable performance test methods and procedures per 40 CFR Part 63, Subpart SSSS in lieu of the performance test methods and procedures contained in 40 CFR Part 60, Subpart TT. Subpart SSSS performance test methods and procedures are generally more stringent than the performance test methods and procedures of Subpart TT.

2.b The emission testing shall be conducted within 6 months prior to the expiration of this facility's Title V permit.

2.c The test(s) shall be conducted while the emissions units are operating at or near the maximum capacities for collected emissions from this emissions unit (K002), unless otherwise specified or approved by the Ohio EPA, Central District Office.

2.d The permittee shall conduct, or have conducted, a performance test for each capture and control system to determine the destruction or removal efficiency of each control device according to 40 CFR 63.5160(d) as described in section A.V.2.h, and the capture efficiency of each capture system according to 40 CFR 63.5160(e) as described in section A.V.2.i, while burning natural gas in the curing ovens and collecting emissions from this emissions unit (K002).

2.e The permittee shall determine the organic HAP weight fraction of each coating material applied by following one of the procedures in accordance with 40 CFR 63.5160(b):

i. the permittee may test the material in accordance with Method 311 of appendix A of 40 CFR 63. The Method 311 determination may be performed by the manufacturer of the material and the results provided to the permittee.. The organic HAP content shall be calculated according to the following criteria and procedures:

(1) count only those organic HAP that are measured to be present at greater than or equal to 0.1 weight percent for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and greater than or equal to 1.0 weight percent for other organic HAP compounds;

(2) express the weight fraction of each organic HAP counted according to subparagraph (2). of this section as a value truncated to four places after the decimal point (for example, 0.3791); and

(3) calculate the total weight fraction of organic HAP in the tested material by summing the counted individual organic HAP weight fractions and truncating the result to three places after the decimal point (for example, 0.763);

V. Testing Requirements (continued)

ii. for coatings, the permittee may determine the total volatile matter content as weight fraction of non-aqueous volatile matter and use it as a substitute for organic HAP, using Method 24 of 40 CFR 60, appendix A. The Method 24 determination may be performed by the manufacturer of the coating and the results provided to the permittee;

iii. the permittee may use an alternative test method for determining the organic HAP weight fraction once the Administrator has approved it. The permittee shall follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval; and

iv. the permittee may use formulation data provided that the information represents each organic HAP present at a level equal to or greater than 0.1 percent for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and equal to or greater than 1.0 percent for other organic HAP compounds in any raw material used, weighted by the mass fraction of each raw material used in the material. Formulation data may be provided by the manufacturer of the coating material. In the event of any inconsistency between test data obtained with the test methods specified in paragraphs (i) through (iii) of term A.V.2.e and formulation data, the test data will govern.

2.f Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings.

2.g In accordance with 40 CFR 63.5160(c), the permittee shall determine the solids content of each coating material applied. The permittee may determine the volume solids content using ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 (incorporated by reference, see 40 CFR 63.14), or an EPA approved alternative method. The ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 determination may be performed by the manufacturer of the material and the results provided to the permittee. Alternatively, the permittee may rely on formulation data provided by material providers to determine the volume solids.

2.h The permittee shall conduct, or have conducted, a performance test to establish the destruction or removal efficiency of the control device or the outlet VOC concentration achieved by the oxidizer, according to the methods and procedures in Methods 1 through 4 and 25 or 25A, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

2.i The permittee shall determine the capture efficiency of the enclosure on the coating operation by one of the following procedures:

i. for an enclosure that meets the criteria for a PTE, the permittee may assume it achieves 100 percent capture efficiency. The permittee must confirm that the capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40 CFR 51, Appendix M (or an EPA approved alternative method), and that all exhaust gases from the enclosure are delivered to a control device;

ii. the permittee may determine capture efficiency, CE, according to the protocols for testing with temporary total enclosures that are specified in Method 204A through F of 40 CFR 51, Appendix M. The permittee may exclude never-controlled work stations from such capture efficiency determinations; and

iii. as an alternative to the procedures specified in paragraphs (i)(i) and (ii) of this section, if a capture efficiency test is required, the permittee may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective or the Lower Confidence Limit approach as described in Appendix A to 40 CFR 63, Subpart KK. The permittee may exclude never-controlled work stations from such capture efficiency determinations.

2.j During the performance test specified in paragraph (i) of this section, the permittee shall monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. The permittee shall monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs. The permittee shall use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for the thermal oxidizer for purposes of 40 CFR Part 63, Subpart SSSS. This average combustion temperature minus 50 degrees Fahrenheit is the minimum operating limit for the thermal oxidizer for purposes of 40 CFR Part 60, Subpart TT.

V. Testing Requirements (continued)

3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Mix Room (P010)

Activity Description: Paint Mix/Clean-Up Room

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Paint Mix Room/Cleanup Room (P010)	OAC rule 3745-21-07(A)(1)	See Section A.I.2.a

2. Additional Terms and Conditions

2.a This emissions unit is located in Shelby County. Shelby County is not a listed "Priority I" county under OAC rule 3745-21-06. Based on the application, this emissions unit was installed and has not been modified since January 1965. Under OAC rule 3745-31-01(UUU), a "New source", is an emissions unit that was installed and/or modified after January 1, 1974.

Since this emissions unit is not in a "Priority I" county and this emissions unit is not a "new stationary source", the requirements of OAC rule 3745-21-07 are not applicable.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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