



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184  
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049

5/11/2009

Mr. Roger Blem  
MSC Walbridge Coatings Inc  
30610 East Broadway  
Walbridge, OH 43465

Certified Mail  
Facility ID: 0387000046  
Permit Number: P0087849  
County: Wood

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT  
Permit Type: Initial

Dear Permit Holder:

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 issuance of this Title V permit is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

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

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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc>.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
Ohio EPA DAPC, Northwest District Office

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





**State of Ohio Environmental Protection Agency  
Division of Air Pollution Control**

**FINAL**

**Title V Permit to Control Air Pollution  
OAC Chapter 3745-77**

**MSC Walbridge Coatings Inc**

Facility ID: 0387000046  
Permit Number: P0087849  
Permit Type: Initial  
Issued: 5/11/2009  
Effective: 6/1/2009  
Expiration: 6/1/2014





State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Title V Permit to Control Air Pollution**  
**OAC Chapter 3745-77**  
 MSC Walbridge Coatings Inc

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Title V Permit**  
**Permit Number:** P0087849  
**Facility ID:** 0387000046  
**Effective Date:** 6/1/2009

## Authorization

Facility ID: 0387000046  
Facility Description: Metal Coating and Allied Services  
Application Number(s): A0018928, A0018929  
Permit Number: P0087849  
Permit Description: Initial Title V Permit for Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers  
Permit Type: Initial  
Issue Date: 5/11/2009  
Effective Date: 6/1/2009  
Expiration Date: 6/1/2014  
Superseded Permit Number:

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

MSC Walbridge Coatings Inc  
30610 East Broadway  
Walbridge, OH 43465

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Title V Permit**  
**Permit Number:** P0087849  
**Facility ID:** 0387000046  
**Effective Date:** 6/1/2009

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



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

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
  - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
  - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
  - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations  
*(Authority for term: ORC 3704.036(A))*

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

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*
- c) The permittee shall submit required reports in the following manner:
  - (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:



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

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

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

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

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

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

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

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



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

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

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

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

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

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

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



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

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

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

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

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.

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

### **3. Scheduled Maintenance**

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

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

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

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

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

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

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

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

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



**6. Severability Clause**

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

**7. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
  - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee



shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

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

## **8. Fees**

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

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

## **9. Marketable Permit Programs**

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

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

## **10. Reasonably Anticipated Operating Scenarios**

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

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

## **11. Reopening for Cause**

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

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



- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.  
*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

## **12. Federal and State Enforceability**

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

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

## **13. Compliance Requirements**

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the



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

- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
- (2) Compliance certifications shall include the following:
  - (a) An identification of each term or condition of this permit that is the basis of the certification.
  - (b) The permittee's current compliance status.
  - (c) Whether compliance was continuous or intermittent.
  - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
  - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

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

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

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

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

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

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

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



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

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

## **16. Emergencies**

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

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

## **17. Off-Permit Changes**

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

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

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

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



**18. Compliance Method Requirements**

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

**19. Insignificant Activities or Emissions Levels**

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

**20. Permit to Install Requirement**

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

**21. Air Pollution Nuisance**

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

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

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

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

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



**23. Title VI Provisions**

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

- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.  
*(Authority for term: OAC rule 3745-77-01(H)(11))*

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

The permittee shall submit required reports in the following manner:

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

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

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

**26. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports



pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

**27. Scheduled Maintenance/Malfunction Reporting**

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

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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

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

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

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

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Title V Permit**  
**Permit Number:** P0087849  
**Facility ID:** 0387000046  
**Effective Date:** 6/1/2009

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



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

- a) 4.

2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subparts SSSS, National Emission Standards for Hazardous Air Pollutants, Surface Coating of Metal Coil: K001 and K002. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart SSSS. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart SSSS. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart SSSS, and Subpart A.

All the requirements of 40 CFR Part 63, Subpart SSSS have been established in the Title V permit for this facility, which will encompass these emissions units upon reissuance. The applicable sections of 40 CFR Part 63, Subpart SSSS have been cited in the appropriate sections for the non-insignificant emissions units (K001 and K002) subject to this rule. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

(Authority for term: 40 CFR Part 63, Subpart SSSS)

3. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified Permit to Install (PTI) for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirement contained in a permit to install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

- a) hydraulic oil storage, emissions unit T002 (PTI #03-7566);
- b) ship oil storage, emissions unit T003 (PTI #03-7566); and
- c) prelube oil storage, emissions unit T004 (PTI #03-7566).

4. 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:

- a) caustic storage, emissions unit T005;
- b) sulfuric acid storage, emissions unit T006;
- c) polymer storage, emissions unit T007;
- d) cleaner storage, emissions unit T008;
- e) electrolyte storage #1, emissions unit T009;
- f) electrolyte storage #2, emissions unit T010;
- g) electrolyte storage #3, emissions unit T011;



- h) electrolyte storage #4, emissions unit T012;
- i) electrolyte storage #5, emissions unit T013;
- j) electrolyte storage #6, emissions unit T014;
- k) electrolyte storage #7, emissions unit T015;
- l) pump cleaning tank, emissions unit T016;
- m) laminator heater, emissions unit P002;
- n) alkaline waste tank #1, emissions unit T017;
- o) alkaline waste tank #2, emissions unit T018;
- p) acid waste tank #2, emissions unit T019;
- q) metals waste tank #T1, emissions unit T020; and
- r) metals waste #T8, emissions unit T021.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Title V Permit**  
**Permit Number:** P0087849  
**Facility ID:** 0387000046  
**Effective Date:** 6/1/2009

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



**1. B001, boiler #1**

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

25.1 MBTU natural or landfill gas fired, industrial steam boiler for process steam generation

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-16179, issued on 2/10/05, modified on 2/27/07)	2.44 lbs nitrogen oxides (NOx)/hr; 10.69 tons NOx/yr  2.05 lbs carbon monoxide (CO)/hr; 8.98 tons CO/yr  0.13 lb organic compounds (OC)/hr; 0.57 ton OC/yr  2.39 lbs sulfur dioxide (SO2)/hr; 10.47 tons SO2/yr  0.41 lb particulate emissions (PE)/hr; 1.80 tons PE/yr  Visible PE shall not exceed 10% opacity, as a six-minute average.  See b)(2)a.
b.	OAC rule 3745-17-10(B)(1)	See b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	See .b)(2)c.
d.	OAC rule 3745-21-08(B)	See b)(2)e.
e.	40 CFR 63.52(a)(2)	See b)(2)f.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) must be employed. For this emissions unit BAT has been determined to be compliance with the terms and conditions of this permit.



- b. The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. The visible emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. OAC Chapter 3745-18 does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas/treated landfill gas\* as fuel.

\* "Treated" landfill gas is considered to be equivalent to natural gas.

- e. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install 03-16179.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- f. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

c) Operational Restrictions

- (1) The emissions unit shall burn "treated" landfill gas and/or natural gas only.

[OAC rule 3745-77-07(A)(1) and PTI #03-16179]

d) Monitoring and/or Recordkeeping Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]



e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

f) Testing Requirements

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

a. Emissions Limitations:

2.44 lbs NOx/hr, 10.69 tons NOx/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable NOx emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (24,416 ft<sup>3</sup>/hr) by the emission factor of 100 lbs NOx/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 7.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

b. Emissions Limitations:

2.05 lbs CO/hr; 8.98 tons CO/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable CO emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (24,416 ft<sup>3</sup>/hr) by the emission factor of 84 lbs CO/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 10.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the



hourly emission limitation, compliance with the annual emission limitation shall be assumed.

c. Emissions Limitations:

0.13 lb OC/hr; 0.57 ton OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (24,416 ft<sup>3</sup>/hr) by the emission factor of 5.5 lbs OC/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-2 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 18, 25, or 25A, as appropriate.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

The annual emissions limitation was developed by multiplying the lbs OC/hr limitation, the maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, if compliance is shown with the lb OC/hr limitation, compliance with the annual limitation will be assumed.

d. Emissions Limitations:

2.39 lbs SO<sub>2</sub>/hr; 10.47 tons SO<sub>2</sub>/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable SO<sub>2</sub> emission limitation by using the following equation:

$$SO_2 = (\text{ppmv}) \times (\text{MW}) \times (\text{DSCFM}) \times (1.5584 \times 10^{-7}) \text{ at } 680 \text{ deg F and } 29.92 \text{ inches Hg (equation to convert ppm to lbs/hr)}$$

where,

ppmv = the concentration of SO<sub>2</sub> in landfill gas [given as 46.9 ppmv in AP-42 Chapter 2 Section 4 (11/98)]

MW = molecular weight of SO<sub>2</sub> (64.04 lbs/lb moles)

DSCFM = stack gas dry volumetric flow rate at standard conditions (5100 ft<sup>3</sup>/minute)



If required, the permittee shall demonstrate compliance with the hourly allowable SO<sub>2</sub> emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 6.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

e. Emissions Limitation:

0.41 lb PE/hr; 1.80 tons PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable PE limitation by multiplying the maximum landfill gas fuel usage of 50,228 ft<sup>3</sup>/hr by the emission factor of 8.2 lb PE/mm cu. ft of natural gas [from AP-42, Chapter 2, Table 2.4-5 (revised 11/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods, 1-5.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

f. Emissions Limitation:

Visible PE shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 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, 2002.

g) Miscellaneous Requirements

(1) None.



**2. B002, boiler #2**

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

7.32 MBTU natural or landfill gas fired, industrial steam boiler for process steam generation

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-16179, issued on 2/10/05, modified on 2/27/07)	0.71 lb nitrogen oxides (NOx)/hr; 3.11 tons NOx/yr  0.60 lb carbon monoxide (CO)/hr; 2.63 tons CO/yr  0.04 lb organic compounds (OC)/hr; 0.18 ton OC/yr  0.75 lb sulfur dioxide (SO2)/hr; 3.29 tons SO2/yr  0.12 lb particulate emissions (PE)/hr; 0.53 ton PE/yr  Visible PE shall not exceed 10% opacity, as a six-minute average.  See b)(2)a.
b.	OAC rule 3745-17-10(B)(1)	See b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
d.	OAC rule 3745-21-08(B)	See b)(2)e.
e.	40 CFR 63.52(a)(2)	See b)(2)f.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) must be employed. For this emissions unit BAT has been determined to be compliance with the terms and conditions of this permit.



- b. The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. The visible emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. OAC Chapter 3745-18 does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas/treated landfill gas\* as fuel.

\* "Treated" landfill gas is considered to be equivalent to natural gas.

- e. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install 03-16179.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- f. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

c) Operational Restrictions

- (1) The emissions unit shall burn "treated" landfill gas and/or natural gas only.

[OAC rule 3745-77-07(A)(1) and PTI #03-16179]

d) Monitoring and/or Recordkeeping Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]



e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

f) Testing Requirements

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

a. Emissions Limitations:

0.71lb NO<sub>x</sub>/hr, 3.11 tons NO<sub>x</sub>/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable NO<sub>x</sub> emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (7,120 ft<sup>3</sup>/hr) by the emission factor of 100 lbs NO<sub>x</sub>/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable NO<sub>x</sub> emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 7.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

b. Emissions Limitations:

0.60 lb CO/hr; 2.63 tons CO/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable CO emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (7,120 ft<sup>3</sup>/hr) by the emission factor of 84 lbs CO/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 10.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the



hourly emission limitation, compliance with the annual emission limitation shall be assumed.

c. Emissions Limitations:

0.04 lb OC/hr; 0.18 ton OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (7,120 ft<sup>3</sup>/hr) by the emission factor of 5.5 lbs OC/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 18, 25, or 25A, as appropriate.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

The annual emissions limitation was developed by multiplying the lbs OC/hr limitation, the maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, if compliance is shown with the lb OC/hr limitation, compliance with the annual limitation will be assumed.

d. Emissions Limitations:

0.75 lb SO<sub>2</sub>/hr; 3.29 tons SO<sub>2</sub>/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable SO<sub>2</sub> emission limitation by using the following equation:

$$SO_2 = (\text{ppmv}) \times (\text{MW}) \times (\text{DSCFM}) \times (1.5584 \times 10^{-7}) \text{ at } 680 \text{ deg F and } 29.92 \text{ inches Hg (equation to convert ppm to lbs/hr)}$$

where,

ppmv = the concentration of SO<sub>2</sub> in landfill gas [given as 46.9 ppmv in AP-42 Chapter 2 Section 4 (11/98)]

MW = molecular weight of SO<sub>2</sub> (64.04 lbs/lb moles)

DSCFM = stack gas dry volumetric flow rate at standard conditions (1600 ft<sup>3</sup>/minute)



If required, the permittee shall demonstrate compliance with the hourly allowable SO<sub>2</sub> emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 6.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

e. Emissions Limitation:

0.12 lb PE/hr; 0.53 ton PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable PE limitation by multiplying the maximum landfill gas fuel usage of 14,612 ft<sup>3</sup>/hr by the emission factor of 8.2 lbs PE/mm cu. ft of natural gas [from AP-42, Chapter 2, Table 2.4-5 (revised 11/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods, 1-5.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

f. Emissions Limitation:

Visible PE shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 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, 2002.

g) Miscellaneous Requirements

(1) None.



**3. B003, boiler #3**

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

25.1 MBTU natural or landfill gas fired, industrial steam boiler for process steam generation

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-16179, issued on 2/10/05, modified on 2/27/07)	2.44 lbs nitrogen oxides (NOx)/hr; 10.69 tons NOx/yr  2.05 lbs carbon monoxide (CO)/hr; 8.98 tons CO/yr  0.13 lb organic compounds (OC)/hr; 0.57 ton OC/yr  2.39 lbs sulfur dioxide (SO2)/hr; 10.47 tons SO2/yr  0.41 lb particulate emissions (PE)/hr; 1.80 tons PE/yr  Visible PE shall not exceed 10% opacity, as a six-minute average.  See b)(2)a.
b.	OAC rule 3745-17-10(B)(1)	See b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	See b)(2)c.
d.	OAC rule 3745-21-08(B)	See b)(2)e.
e.	40 CFR 63.52(a)(2)	See b)(2)f.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) must be employed. For this emissions unit BAT has been determined to be compliance with the terms and conditions of this permit.



- b. The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- c. The visible emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. OAC Chapter 3745-18 does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas/treated landfill gas\* as fuel.

\* "Treated" landfill gas is considered to be equivalent to natural gas.

- e. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install 03-16179.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- f. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

c) Operational Restrictions

- (1) The emissions unit shall burn "treated" landfill gas and/or natural gas only.

[OAC rule 3745-77-07(A)(1) and PTI #03-16179]

d) Monitoring and/or Recordkeeping Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]



e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

f) Testing Requirements

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

a. Emissions Limitations:

2.44 lbs NOx/hr, 10.69 tons NOx/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable NOx emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (24,416 ft<sup>3</sup>/hr) by the emission factor of 100 lbs NOx/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 7.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

b. Emissions Limitations:

2.05 lbs CO/hr; 8.98 tons CO/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable CO emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (24,416 ft<sup>3</sup>/hr) by the emission factor of 84 lbs CO/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 10.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the



hourly emission limitation, compliance with the annual emission limitation shall be assumed.

c. Emissions Limitations:

0.13 lb OC/hr; 0.57 ton OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (24,416 ft<sup>3</sup>/hr) by the emission factor of 5.5 lbs OC/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-2 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 18, 25, or 25A, as appropriate.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

The annual emissions limitation was developed by multiplying the lbs OC/hr limitation, the maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, if compliance is shown with the lb OC/hr limitation, compliance with the annual limitation will be assumed.

d. Emissions Limitations:

2.39 lbs SO<sub>2</sub>/hr; 10.47 tons SO<sub>2</sub>/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable SO<sub>2</sub> emission limitation by using the following equation:

$$SO_2 = (\text{ppmv}) \times (MW) \times (\text{DSCFM}) \times (1.5584 \times 10^{-7}) \text{ at } 680 \text{ deg F and } 29.92 \text{ inches Hg (equation to convert ppm to lbs/hr)}$$

where,

ppmv = the concentration of SO<sub>2</sub> in landfill gas [given as 46.9 ppmv in AP-42 Chapter 2 Section 4 (11/98)]

MW = molecular weight of SO<sub>2</sub> (64.04 lbs/lb moles)

DSCFM = stack gas dry volumetric flow rate at standard conditions (5100 ft<sup>3</sup>/minute)



If required, the permittee shall demonstrate compliance with the hourly allowable SO<sub>2</sub> emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 6.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

e. Emissions Limitation:

0.41 lb PE/hr; 1.80 tons PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable PE limitation by multiplying the maximum landfill gas fuel usage of 50,228 ft<sup>3</sup>/hr by the emission factor of 8.2 lb PE/mm cu. ft of natural gas [from AP-42, Chapter 2, Table 2.4-5 (revised 11/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods, 1-5.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

f. Emissions Limitation:

Visible PE shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 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, 2002.

g) Miscellaneous Requirements

(1) None.



**4. K001, prime paint curing oven**

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

roll coating application with 65 MMBTU / hour, natural gas fired paint curing oven with thermal oxidizer incinerator

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-746, issued on 05/04/1979)	37 lbs volatile organic compounds (VOC/hr), 125 tons VOC/yr, for emissions units K001 and K002, combined  See b)(2)a.
b.	OAC rule 3745-21-09(B)(6)	See b)(2)b.
c.	40 CFR Part 63, Subpart SSSS (40 CFR 63.5080-5190)  [In accordance with 40 CFR 63.5090(a), this emissions unit is a coil coating line subject to the emissions limitations/control measures specified in Subpart SSSS.]	Limit organic HAP emissions to:  No more than 2 % of the organic HAP applied for each month during each 12-month compliance period (98% reduction); or  No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or  If an oxidizer is used to control organic HAP emissions, the oxidizer should be operated such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 %. [40 CFR 63.5120(a)]  Compliance with one of these standards shall be demonstrated by following the



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>applicable procedures in 63.5170. [40 CFR 63.5120(b)]</p> <p>Compliance shall be maintained at all times, except during periods of start-up, shutdown, and malfunction of any capture system and control device used to comply with this subpart. [40 CFR 63.5140(a)]</p> <p>See b)(2)c.</p>
d.	40 CFR Part 63.1-15 [40 CFR Part 63.5140(b)]	Table 2 to Subpart SSSS of 40 CFR Part 63 – Applicability of General Provisions to Subpart SSSS – provides cross references to subpart A of this part, indicating the applicability of the General Provisions requirements to this subpart.

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) must be employed. For this emissions unit BAT has been determined to be use of a thermal incinerator, and compliance with the terms and conditions of this permit.
- b. In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (E) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to 40 CFR Part 63, Subpart SSSS. Also, the monitoring, record keeping and reporting requirements established under OAC rule 3745-21-09(B)(6) are less stringent than those established pursuant to 40 CFR Part 63, Subpart SSSS, except for the frequency of reporting. Therefore, the frequency of reporting shall continue to be quarterly, as established under OAC 3745-21-09(B)(6).
- c. The permittee has elected the compliance option provided by 40 CFR 63.5120(a)(2) - no more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period, for K001 and K002 combined. This is accomplished through the use of a combination of compliant coatings and control devices (oxidizer) and maintaining an acceptable equivalent emissions rate in accordance with the procedures in 40 CFR 63.5170(d). The permittee is required to notify the Ohio EPA, Northwest District Office prior to the use of other compliance options as identified in 40 CFR 63.5170 and/or compliance with an alternate limit as identified in 40 CFR 63.5120.



c) Operational Restrictions

- (1) The use of cleanup material shall not exceed 14,600 gallons/year.

[OAC rule 3745-77-07(A)(1) and PTI #03-746]

- (2) This emissions unit shall burn natural gas and/or oven emissions only.

[OAC rule 3745-77-07(A)(1)]

- (3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart SSSS, including the following sections:

63.5121(a)	Requirement to meet operating limits established during performance testing, at all times, as specified in Table 1 to Subpart SSSS of Part 63, Operating Limits if Using Add-on Control Devices and Capture System, and to establish the operating limits during the performance test according to the requirements in 63.5160(d)(3).
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[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart SSSS]

- (4) If the permittee elects to change the current compliance option identified in b)(2)(c) with another compliance option identified in 40 CFR 63.5170 and/or compliance with an alternate limit as identified in 40 CFR 63.5120, then the permittee shall maintain compliance with the appropriate operating requirements for the selected option. See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080-5190).

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all the coatings employed in emissions units K001 and K002:

- a. the name and identification number of each coating employed;
- b. the VOC content of each coating employed, as applied, in pounds per gallon;
- c. the number of gallons of each coating employed;
- d. the VOC emissions rate for each coating employed [d)(1)b. x d)(1)c. x (1 - the control efficiency demonstrated in the most recent compliance test)], in pounds;
- e. the total VOC emissions rate for all the coatings employed [summation of d)(1)d. for all coatings], in lbs or tons; and



- f. the annual year to date VOC emissions for all the coatings employed, for emissions units K001 and K002, combined [summation of d)(1)e. for K001 and K002, for each calendar month to date from January to December], in tons.

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

- (2) The permittee shall collect and record the following information each month for cleanup operations, for emissions units K001 and K002, combined:

- a. the name and identification of each cleanup material employed;
- b. the VOC content of each cleanup material employed, in pounds per gallon;
- c. the number of gallons of each cleanup material employed;
- d. the VOC emissions from each cleanup material employed [d)(2)b. x d)(2)c.];
- e. the total VOC emissions from all cleanup materials employed [the summation of d)(2)d. for all cleanup materials], in pounds or tons;
- f. the annual year to date VOC emissions from the cleanup operations, in tons per year [summation of d)(2)e. for each calendar month to date from January to December]; and
- g. the annual, year to date number of gallons of cleanup material used [summation of d)(2)c. for each calendar month to date from January to December].

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

- (3) The permittee shall collect and record the annual year to date VOC emissions from the coating and cleanup operations, in tons per year [summation of d)(1)f. and d)(2)f.], for emissions units K001 and K002, combined.

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

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

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

- (5) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart SSSS, including the following sections:

63.5150(a)(1)	Bypass monitoring
63.5150(a)(3)	Temperature monitoring of oxidizers
63.5150(a)(4)	Capture system monitoring
63.5150(b)	Deviation from the monitoring requirements of 5150(a)(3) or (a)(4) is



	considered a deviation from the operating limit
63.5170(d)(3)	Compliance demonstration procedures as specified in 63.5170(f) and (g).
63.5170(g)(3)(i), (ii), and (iii)(B)	Compliance demonstration using performance test and continuous monitoring of operating parameters .
63.5170(f)(1)(i) through (v), (ix) and (h)	Methodology for calculating the organic HAP emissions rate on a monthly basis in order to demonstrate compliance with the limit of 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period.
63.5190(a)(1)	Requirement to record compliance option used, along with the beginning and ending dates and times each option was used.
63.5190(a)(2)(ii)	Requirement to keep records needed to demonstrate compliance with control device and capture system operating parameter data in accordance with 63.5150(a)(1), (a)(3), and (a)(4).
63.5190(a)(2)(iii)	Requirement to keep records of organic HAP content data for the purpose of demonstrating compliance in accordance with 63.5160(b).
63.5190(a)(2)(iv)	Requirement to keep records of volatile matter and solids content data for the purpose of demonstrating compliance in accordance with 63.5160(c).
63.5190(a)(2)(v)	Requirement to keep record of overall control efficiency determination or alternative outlet HAP concentration using capture efficiency tests and control device destruction or removal efficiency test in accordance with 63.5160(d), (e), and (f).
63.5190(a)(2)(vi)	Requirement to keep records of material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with 63.5170(a), (b), and (d).
63.5190(a)(3)	Requirement to keep records specified in



	63.10(b)(3).
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[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart SSSS]

- (6) If the permittee elects to change the current compliance option identified in b)(2)(c) with another compliance option identified in 40 CFR 63.5170 and/or compliance with an alternate limit as identified in 40 CFR 63.5120, then the permittee shall maintain compliance with the appropriate monitoring and recordkeeping requirements for the selected option. See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080-5190).

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

e) Reporting Requirements

- (1) The permittee shall submit an annual summary report that identifies the following:
  - a. the actual annual VOC emissions from the coating operations for emissions units K001 and K002, combined;
  - b. the actual annual VOC emissions from the cleanup operations for emissions units K001 and K002, combined;
  - c. the total actual annual VOC emissions from the coating and cleanup operations for emissions units K001 and K002, combined; and
  - d. the total actual annual number of gallons of cleanup materials used;

This annual report shall be submitted by January 31 of each year to the Ohio EPA-NWDO, and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-746]

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

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

- (3) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart SSSS, per the following sections:

63.5180(b)	Initial notification report as specified in 63.9(b).
63.5180(c)	Notification of performance test as specified in 63.7 and 63.9(e).
63.5180(d)	Notification of compliance status as specified in 63.9(h).



63.5180(e)	Requirement to submit performance test reports as specified in 63.10(d)(2)
63.5180(f)	Requirement to submit start-up, shutdown, and malfunction reports as specified in 63.10(d)(5)
63.5180(g)	Requirement to submit semi-annual reports: compliance report dates and required content
63.5180(h)	Semi-annual report: information requirement for each deviation occurring at an affected source without a CEMS

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

- (4) If the permittee elects to change the current compliance option identified in b)(2)(c) with another compliance option identified in 40 CFR 63.5170 and/or compliance with an alternate limit as identified in 40 CFR 63.5120, then the permittee shall maintain compliance with the appropriate reporting requirements for the selected option. See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080-5190).

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

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. The emissions testing shall be conducted within 2.5 years after the effective date of the permit. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
  - b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emissions rates for VOC, and shall include the capture and control efficiencies of the control equipment.
  - c. The following test methods shall be employed to demonstrate compliance with the above emissions limitations:
    - i. for VOC, Methods 1-4 and 18, 25, or 25C of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
    - ii. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPAs "Guidelines for



Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

- iii. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
  - e. 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, NWDO. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA's refusal to accept the results of the emissions tests.
  - f. Personnel from the Ohio EPA 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.
  - g. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA NWDO.
- (2) Compliance with the emissions limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emissions Limitations:  
  
37 lbs VOC/hr, 125 tons VOC/yr, for emissions units K001 and K002, combined  
  
Applicable Compliance Method:  
  
Compliance with the hourly allowable VOC emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with the performance testing required in condition f)(1) of this permit.



Compliance with the annual emission limitation shall be demonstrated based on the record keeping requirements established in section d)(1) and d)(2) of this permit.

b. Emissions Limitations:

Limit organic HAP emissions to:

- i. No more than 2 % of the organic HAP applied for each month during each 12-month compliance period (98% reduction); or
- ii. No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or
- iii. If an oxidizer is used to control organic HAP emissions, the oxidizer should be operated such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 %.

Applicable Compliance Method:

The permittee shall demonstrate compliance with f)(2)(b)(ii) [0.046 kilogram of organic HAP per liter of solids applied during each 12-month compliance period] through the use of a combination of capture system and control device (oxidizer) to control organic HAP emissions and compliant coatings, in accordance with the procedures in 40 CFR 63.5170(d). A performance test to determine the control device destruction or removal efficiency (DRE), and capture efficiency, using the applicable test methods and procedures in 40 CFR 63.5160(d) and (e), shall be conducted in accordance with the performance testing required in condition f)(1) of this permit. Capture and control efficiencies are ensured through the monitoring of oxidizer temperature and compliance with the Capture System Monitoring Plan dated August 2006, according to 40 CFR 63.5150(a)(3) and (a)(4).

If the permittee elects to change the current compliance option identified in b)(2)(c) with another compliance option identified in 40 CFR 63.5170 and/or compliance with an alternate limit as identified in 40 CFR 63.5120, then the permittee shall demonstrate and maintain compliance with the appropriate testing requirements for the selected option. See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080-5190).

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

g) Miscellaneous Requirements

- (1) If the permittee chooses to use an add-on control device other than those listed in Table 1 to Subpart SSSS, or chooses to monitor an alternative parameter and comply with a different operating limit, the permittee must apply to the Administrator of the USEPA for approval of the alternative monitoring under 63.8(f).

[40 CFR Part 63.5121(b)]



**5. K002, finish paint curing oven**

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

roll coating application with 65 MMBTU / hour, natural gas fired paint curing oven with thermal oxidizer incinerator

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC 3745-31-05(A)(3) (PTI #03-746, issued on 05/04/1979)	37 lbs volatile organic compounds (VOC/hr), 125 tons VOC/yr, for emissions units K001 and K002, combined  See b)(2)a.
b.	OAC rule 3745-21-09(B)(6)	See b)(2)b.
c.	40 CFR Part 63, Subpart SSSS (40 CFR 63.5080-5190)  [In accordance with 40 CFR 63.5080(a), this emissions unit is a coil coating line subject to the emissions limitations/control measures specified in Subpart SSSS.]	Limit organic HAP emissions to:  No more than 2 % of the organic HAP applied for each month during each 12-month compliance period (98% reduction); or  No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or  If an oxidizer is used to control organic HAP emissions, the oxidizer should be operated such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 %. [40 CFR 63.5120(a)]  Demonstrate compliance with one of these standards by following the



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>applicable procedures in 63.5170.            [40 CFR 63.5120(b)]</p> <p>Compliance shall be maintained at all times, except during periods of start-up, shutdown, and malfunction of any capture system and control device used to comply with this subpart.            [40 CFR 63.5140(a)]</p> <p>See b)(2)c.</p>
d.	40 CFR Part 63.1-15 [40 CFR Part 63.5140(b)]	Table 2 to 40 CFR Part 63.5140 – Applicability of General Provisions to Subpart SSSS – provides cross references to subpart A of this part, indicating the applicability of the General Provisions requirements to this subpart.

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) must be employed. For this emissions unit BAT has been determined to be use of a thermal incinerator, and compliance with the terms and conditions of this permit.
- b. In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (E) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to 40 CFR Part 63, Subpart SSSS. Also, the monitoring, record keeping and reporting requirements established under OAC rule 3745-21-09(B)(6) are less stringent than those established pursuant to 40 CFR Part 63, Subpart SSSS, except for the frequency of reporting. Therefore, the frequency of reporting shall continue to be quarterly, as established under OAC 3745-21-09(B)(6).
- c. The permittee has elected the compliance option provided by 40 CFR 63.5120(a)(2) - no more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period. This is accomplished through the use of a combination of compliant coatings and control devices (oxidizer) and maintaining an acceptable equivalent emissions rate in accordance with the procedures in 40 CFR 63.5170(d). The permittee is required to notify the Ohio EPA, Northwest District Office prior to the use of other compliance options as identified in 40 CFR 63.5170 and/or compliance with an alternate limit as identified in 40 CFR 63.5120.



c) Operational Restrictions

- (1) The use of cleanup material shall not exceed 14,600 gallons/year.

[OAC rule 3745-77-07(A)(1) and PTI #03-746]

- (2) This emissions unit shall burn natural gas and/or oven emissions only.

[OAC rule 3745-77-07(A)(1)]

- (3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart SSSS, including the following sections:

63.5121(a)	Requirement to meet operating limits established during performance testing, at all times, as specified in Table 1 to Subpart SSSS of Part 63, Operating Limits if Using Add-on Control Devices and Capture System, and to establish the operating limits during the performance test according to the requirements in 63.5160(d)(3).
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[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart SSSS]

- (4) If the permittee elects to change the current compliance option identified in b)(2)(c) with another compliance option identified in 40 CFR 63.5170 and/or compliance with an alternate limit as identified in 40 CFR 63.5120, then the permittee shall maintain compliance with the appropriate operating requirements for the selected option. See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080-5190).

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

- (5) Coatings that contain organic HAP materials shall be used only when the oxidizer is operating.

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all the coatings employed in emissions units K001 and K002:
  - a. the name, and identification number, of each coating employed;
  - b. the VOC content of each coating employed, as applied, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the VOC emissions rate for each coating employed [d)(1)b. x d)(1)c. x (1 - the control efficiency demonstrated in the most recent compliance test)], in pounds;



- e. the total VOC emissions rate for all the coatings employed [summation of d)(1)d. for all coatings], in lbs or tons; and
- f. the annual year to date VOC emissions for all the coatings employed, for emissions units K001 and K002, combined [summation of d)(1)e. for K001 and K002, for each calendar month to date from January to December], in tons.

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

(2) The permittee shall collect and record the following information each month for cleanup operations, for emissions units K001 and K002, combined:

- a. the name and identification of each cleanup material employed;
- b. the VOC content of each cleanup material employed, in pounds per gallon;
- c. the number of gallons of each cleanup material employed;
- d. the VOC emissions from each cleanup material employed [d)(2)b. x d)(2)c.];
- e. the total VOC emissions from all cleanup materials employed [the summation of d)(2)d. for all cleanup materials], in pounds or tons;
- f. the annual year to date VOC emissions from the cleanup operations, in tons per year [summation of d)(2)e. for each calendar month to date from January to December]; and
- g. the annual, year to date number of gallons of cleanup material used [summation of d)(2)c. for each calendar month to date from January to December].

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

(3) The permittee shall collect and record the annual year to date VOC emissions from the coating and cleanup operations, in tons per year [summation of d)(1)f. and d)(2)f.], for emissions units K001 and K002, combined.

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

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

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

(5) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart SSSS, including the following sections:

63.5150(a)(1)	Bypass monitoring
63.5150(a)(3)	Temperature monitoring of oxidizers



63.5150(a)(4)	Capture system monitoring
63.5150(b)	Deviation from the monitoring requirements of 5150(a)(3) or (a)(4) is considered a deviation from the operating limit
63.5170(d)(3)	Compliance demonstration procedures as specified in 63.5170(f) and (g).
63.5170(g)(3)(i), (ii), and (iii)(B)	Compliance demonstration using performance test and continuous monitoring of operating parameters .
63.5170(f)(1)(i) through (v), (ix) and (h)	Methodology for calculating the organic HAP emissions rate on a monthly basis in order to demonstrate compliance with the limit of 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period.
63.5190(a)(1)	Requirement to record compliance option used, along with the beginning and ending dates and times each option was used.
63.5190(a)(2)(ii)	Requirement to keep records needed to demonstrate compliance with control device and capture system operating parameter data in accordance with 63.5150(a)(1), (a)(3), and (a)(4).
63.5190(a)(2)(iii)	Requirement to keep records of organic HAP content data for the purpose of demonstrating compliance in accordance with 63.5160(b).
63.5190(a)(2)(iv)	Requirement to keep records of volatile matter and solids content data for the purpose of demonstrating compliance in accordance with 63.5160(c).
63.5190(a)(2)(v)	Requirement to keep record of overall control efficiency determination or alternative outlet HAP concentration using capture efficiency tests and control device destruction or removal efficiency test in accordance with 63.5160(d), (e), and (f).
63.5190(a)(2)(vi)	Requirement to keep records of material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in



	accordance with 63.5170(a), (b), and (d).
63.5190(a)(3)	Requirement to keep records specified in 63.10(b)(3).

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

- (6) If the permittee elects to change the current compliance option identified in b)(2)(c) with another compliance option identified in 40 CFR 63.5170 and/or compliance with an alternate limit as identified in 40 CFR 63.5120, then the permittee shall maintain compliance with the appropriate monitoring and recordkeeping requirements for the selected option. See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080-5190).

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

e) Reporting Requirements

- (1) The permittee shall submit an annual summary report that identifies the following:
  - a. the actual annual VOC emissions from the coating operations for emissions units K001 and K002, combined;
  - b. the actual annual VOC emissions from the cleanup operations for emissions units K001 and K002, combined;
  - c. the total actual annual VOC emissions from the coating and cleanup operations for emissions units K001 and K002, combined; and
  - d. the total actual annual number of gallons of cleanup materials used.

This annual report shall be submitted by January 31 of each year to the Ohio EPA-NWDO, and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-746]

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

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

- (3) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart SSSS, per the following sections:

63.5180(b)	Initial notification report
63.5180(c)	Notification of performance test
63.5180(d)	Notification of compliance status



63.5180(e)	Requirement to submit performance test reports as specified in 63.10(d)(2)
63.5180(f)	Requirement to submit start-up, shutdown, and malfunction reports as specified in 63.10(d)(5)
63.5180(g)	Requirement to submit semi-annual reports: compliance report dates and required content
63.5180(h)	Semi-annual report: information requirement for each deviation occurring at an affected source without a CEMS

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

- (4) If the permittee elects to change the current compliance option identified in b)(2)(c) with another compliance option identified in 40 CFR 63.5170 and/or compliance with an alternate limit as identified in 40 CFR 63.5120, then the permittee shall maintain compliance with the appropriate reporting requirements for the selected option. See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080-5190).

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

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. The emissions testing shall be conducted 2.5 years after the effective date of the permit. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
  - b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emissions rates for VOC, and shall include the capture and control efficiencies of the control equipment.
  - c. The following test methods shall be employed to demonstrate compliance with the above emissions limitations:
    - i. for VOC, Methods 1-4 and 18, 25, or 25C of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
    - ii. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPAs "Guidelines for



Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

- iii. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. 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, NWDO. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA's refusal to accept the results of the emissions tests.
- f. Personnel from the Ohio EPA 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.
- g. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA NWDO.

[OAC rule 3745-77-07(C)(1) and PTI #03-746]

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

- a. Emissions Limitations:

37 lbs VOC/hr, 125 tons VOC/yr, for emissions units K001 and K002, combined

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with the performance testing required in condition f)(1) of this permit.



Compliance with the annual emission limitation shall be demonstrated based on the record keeping requirements established in section d)(1) and d)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-746]

b. Emissions Limitations:

Limit organic HAP emissions to:

- i. No more than 2 % of the organic HAP applied for each month during each 12-month compliance period (98% reduction); or
- ii. No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or
- iii. If an oxidizer is used to control organic HAP emissions, the oxidizer should be operated such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 %.

Applicable Compliance Method:

The permittee shall demonstrate compliance with f)(2)(b)(ii) [0.046 kilogram of organic HAP per liter of solids applied during each 12-month compliance period] through the use of a combination of capture system and control device (oxidizer) to control organic HAP emissions and compliant coatings, in accordance with the procedures in 40 CFR 63.5170(d). A performance test to determine the control device destruction or removal efficiency (DRE), and capture efficiency, using the applicable test methods and procedures in 40 CFR 63.5160(d) and (e), shall be conducted in accordance with the performance testing required in condition f)(1) of this permit. Capture and control efficiencies are ensured through the monitoring of oxidizer temperature and compliance with the Capture System Monitoring Plan dated August 2006, according to 40 CFR 63.5150(a)(3) and (a)(4).

If the permittee elects to change the current compliance option identified in b)(2)(c) with another compliance option identified in 40 CFR 63.5170 and/or compliance with an alternate limit as identified in 40 CFR 63.5120, then the permittee shall demonstrate and maintain compliance with the appropriate testing requirements for the selected option. See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080-5190).

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Title V Permit**  
**Permit Number:** P0087849  
**Facility ID:** 0387000046  
**Effective Date:** 6/1/2009

g) Miscellaneous Requirements

- (1) If the permittee chooses to use an add-on control device other than those listed in Table 1 to Subpart SSSS, or chooses to monitor an alternative parameter and comply with a different operating limit, the permittee must apply to the Administrator of the USEPA for approval of the alternative monitoring under 63.8(f).

[40 CFR Part 63.5121(b)]



**6. P001, wet scrubber - EG**

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

exhaust collection from electrogalvanizing

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-6307 issued on 04/29/1992)	1.49 lbs particulate emissions (PE)/hr, 6.53 tons PE/yr  0.097 lb zinc (Zn)/hr, 0.42 ton Zn/yr  0.046 lbs nickel (Ni)/hr, 0.20 tons Ni/yr  See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) must be employed. For this emissions unit BAT has been determined to be use of an impingement scrubber and mist eliminator, and compliance with the terms and conditions of this permit.

b. The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to monitor and record the static pressure drop across the scrubber, in inches of water, during operation



of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the static pressure drop across the scrubber on daily basis.

- (2) Whenever the monitored value for the static pressure drop across the scrubber falls below the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.
- (3) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the static pressure drop across the scrubber immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.
- (4) The static pressure drop across the scrubber shall be maintained at a value of not less than 1.5 inches of water at all times while the emissions unit is in operation.
- (5) This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC 3745-77-07(C)(1)]

- (6) The permittee shall properly install, operate, and maintain equipment to monitor and record the water flow rate, in gallons per minute, across the scrubber during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the water flow rate across the scrubber on daily basis.
- (7) Whenever the monitored value for the water flow rate across the scrubber falls below the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.



- (8) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the water flow rate across the scrubber immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.
- (9) The water flow rate across the scrubber shall be maintained at a value of not less than 9.5 gallons per minute at all times while the emissions unit is in operation.
- (10) This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.  
  
[OAC 3745-77-07(C)(1)]
- (11) The permittee shall properly install, operate, and maintain equipment to monitor and record the scrubber pump pressure, in pounds per square inch (psi), during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the scrubber pump pressure on daily basis.
- (12) Whenever the monitored value for the scrubber pump pressure falls below the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.
- (13) In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the scrubber pump pressure immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the



need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (14) The scrubber pump pressure shall be maintained at a value of not less than 30 psi at all times while the emissions unit is in operation.
- (15) This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the scrubber was outside of the acceptable range;
  - b. each period of time when the scrubber water flow rate was outside of the acceptable range;
  - c. each period of time when the scrubber pump pressure rate was outside of the acceptable range;
  - d. an identification of each incident of deviation described in a., b. and c. above where a prompt investigation was not conducted;
  - e. an identification of each incident of deviation described in a., b. and c. where prompt corrective action, that would bring the pressure drop and/or the scrubber water flow rate into compliance with the acceptable range, was determined to be necessary and was not taken;
  - f. an identification of each incident of deviation described in a., b. and c. where proper records were not maintained for the investigation and/or the corrective action.

These quarterly 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.

[OAC 3745-77-07(C)(1)]



f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months after issuance of the permit and within 6 months prior to permit expiration unless otherwise specified by Engineering Guide 16, and approved by Ohio EPA, Northwest District Office.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rates for PE, Ni, and Zn.
  - c. The following test methods shall be employed to demonstrate compliance with the above emissions limitations:
    - i. for PE, Methods 1- 5 of 40 CFR Part 60, Appendix A;
    - ii. for Ni, Methods 1-4 and 29 of 40 CFR Part 60, Appendix A; and
    - iii. for Zn, Methods 1-4 and 29 of 40 CFR Part 60, Appendix A.
  - d. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
  - e. The tests shall be conducted while the emissions unit is operating at its maximum capacity of 65 tons/hr, unless otherwise specified or approved by the Ohio EPA, NWDO.
  - f. 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, NWDO. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA's refusal to accept the results of the emissions tests.
  - g. Personnel from the Ohio EPA 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.
  - h. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA NWDO.
- (2) Compliance with the emissions limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitations:

0.41 lb PE/hr; 1.80 tons PE/yr

Applicable Compliance Method:

Compliance with the hourly allowable mass emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with the performance testing required in section f)(1) of this permit.

The annual emissions limitation was developed by multiplying the lbs PE/hr limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the lb PE/hr limitation, compliance with the annual limitation shall be assumed.

b. Emissions Limitations:

0.046 lb Ni/hr; 0.20 ton Ni/yr

Applicable Compliance Method:

Compliance with the hourly allowable mass emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with the performance testing required in section f)(1) of this permit.

The annual emissions limitation was developed by multiplying the lbs Ni/hr limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the lb Ni/hr limitation, compliance with the annual limitation shall be assumed.

c. Emissions Limitation:

0.097 lb Zn/hr; 0.42 ton Zn/yr

Applicable Compliance Method:

Compliance with the hourly allowable mass emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with the performance testing required in section f)(1) of this permit.

The annual emissions limitation was developed by multiplying the lbs Zn/hr limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the lb Zn/hr limitation, compliance with the annual limitation shall be assumed.

d. Emissions Limitation:

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Title V Permit**  
**Permit Number:** P0087849  
**Facility ID:** 0387000046  
**Effective Date:** 6/1/2009

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined in accordance with Test Method 9 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, 2002.

g) Miscellaneous Requirements

(1) None.