



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

8/28/2009

Michael Kreps
Deco Plas, Inc.
700 Randolph Street
Montpelier, OH 43543

Certified Mail

Facility ID: 0386000027
Permit Number: P0087765
County: Williams

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

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 7/21/2009. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter.

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

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

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

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

Sincerely,

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

Cc: 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

PRELIMINARY PROPOSED

Air Pollution Title V Permit for Deco Plas, Inc.

Facility ID:	0386000027
Permit Number:	P0087765
Permit Type:	Renewal
Issued:	8/28/2009
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Title V Permit
for
Deco Plas, Inc.

Table of Contents

Authorization 1

A. Standard Terms and Conditions 2

 1. Federally Enforceable Standard Terms and Conditions 3

 2. Monitoring and Related Record Keeping and Reporting Requirements..... 3

 3. Scheduled Maintenance..... 6

 4. Risk Management Plans 6

 5. Title IV Provisions 6

 6. Severability Clause 7

 7. General Requirements 7

 8. Fees..... 8

 9. Marketable Permit Programs..... 8

 10. Reasonably Anticipated Operating Scenarios 8

 11. Reopening for Cause 8

 12. Federal and State Enforceability 9

 13. Compliance Requirements 9

 14. Permit Shield 10

 15. Operational Flexibility..... 10

 16. Emergencies 11

 17. Off-Permit Changes 11

 18. Compliance Method Requirements 12

 19. Insignificant Activities or Emissions Levels..... 12

 20. Permit to Install Requirement 12

 21. Air Pollution Nuisance 12

 22. Permanent Shutdown of an Emissions Unit 12

 23. Title VI Provisions 13

 24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 13

 25. Records Retention Requirements Under State Law Only..... 13

 26. Inspections and Information Requests 13

 27. Scheduled Maintenance/Malfunction Reporting 14

 28. Permit Transfers 14



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

- 29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 14
- B. Facility-Wide Terms and Conditions..... 15
- C. Emissions Unit Terms and Conditions 17
 - 1. K034, C-Line 18
 - 2. K039, Test Paint Booth 30
 - 3. K041, B-Line Paint Booth..... 41
 - 4. Emissions Unit Group - Group #1: K001, K028, K029, K030, K031, K032, 53
 - 5. Emissions Unit Group - Group #2: K040, K043, K044,..... 65



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Preliminary Proposed Title V Permit

Permit Number: P0087765

Facility ID: 0386000027

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0386000027

Facility Description: Motor Vehicle Parts and Accessories

Application Number(s): A0018823, A0036561

Permit Number: P0087765

Permit Description: Renewal Title V permit for a motor vehicle parts and accessory facility

Permit Type: Renewal

Issue Date: 8/28/2009

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Superseded Permit Number:

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

Deco Plas, Inc.
700 Randolph Street
Montpelier, OH 43543

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

Preliminary Proposed Title V Permit

Permit Number: P0087765

Facility ID: 0386000027

Effective Date: To be entered upon final issuance

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

Preliminary Proposed Title V Permit

Permit Number: P0087765

Facility ID: 0386000027

Effective Date: To be entered upon final issuance

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) None.

2. 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 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) N001 – Pyrolysis Cleaning Oven (PTI #03-6384)
 - b) P001 – Department-A Primer Oven (PTI #03-4736)
 - c) P002 – Department-A Final Cure Oven (PTI #03-4736)
 - d) P003 – Department-A Parts Washer and Dry Off Oven (PTI #03-4736)

[OAC rule 3745-77-07(A)(13)]

3. The following emissions units contained in this permit are subject to 40 CFR, Part 63, Subpart M MMM, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products: K001, K028 through K032, K034, K039, K040, K041, K043 and K044. 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 Ohio EPA, Northwest District Office.

[40 CFR, Part 63, Subpart M MMM]

4. The following emissions units contained in this permit are subject to 40 CFR, Part 63, Subpart P PPP, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: K001, K028 through K032, K034, K039, K040, K041, K043 and K044. 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 Ohio EPA, Northwest District Office.

[40 CFR, Part 63, Subpart P PPP]



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Preliminary Proposed Title V Permit

Permit Number: P0087765

Facility ID: 0386000027

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. **K034, C-Line**

Operations, Property and/or Equipment Description:

C-line

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 #03-17378, issued 6/3/08]	38.82 lbs volatile organic compounds (VOC)/hr and 170.03 tons VOC/yr from coating operations [See b)(2)f. and b)(2)g.] 163.43 lbs organic compounds (OC)/month from cleanup operations 8.19 tons OC/yr from cleanup operations for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined See b)(2)a. and c)(2)
b.	OAC rule 3745-31-05(D) [PTI #03-17378, issued 6/3/08]	240 tons VOC/rolling, 12-month period from coating operations for emission units K001, K028 through K032, K034, K039, K040, K041, K043 and K044 combined See b)(2)b., b)(2)c., c)(1) and c)(2)
c.	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day [See b)(2)h. and b)(2)i.]
d.	OAC rule 3745-21-09(U)(1)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit [See b)(2)d.]
e.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity as a 6-minute



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		average except, as provided by rule See b)(2)j.
f.	OAC rule 3745-17-11(B)	3.40 lbs PE/hr See b)(2)e. and b)(2)j.
g.	OAC rule 3745-17-11(C)	See b)(2)k., b)(2)l. c)(3), c)(4), d)(7) through d)(11), e)(4)
h.	40 CFR, Part 63, Subpart MMMM [63.3880 through 63.3981]	See b)(2)m.
i.	40 CFR, Part 63, Subpart PPPP [63.4480 through 63.4581] In accordance with 40 CFR 63.4482(e), this emission unit is an existing affected source at a plastic parts and products surface coating facility.]	See b)(2)m. For each existing general use coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period [63.4490(b)(1)] See b)(2)n., d)(12), e)(4) and f)(2)
j.	40 CFR, Part 63.1 – 15 (40 CFR 63.4501)	Table 2 of Subpart PPPP of 40 CFR Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d), OAC rule 3745-21-07(G)(2), and OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD) regulations:
 - i. 240 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K028 through K032, K034, K039 K040, K041, K043 and K044 combined [See c)(1)].
- c. Permit to Install 03-17378 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3754-31-05(A)(3):
 - i. use of dry filtration system with a minimum control efficiency of 99% for particulate emissions.



The potential to emit for this emissions unit is 0.71 ton PE per year and was determined by multiplying a maximum coating usage rate of 6.0 gallons/hr, a maximum paint density of 11.32 lbs/gallon, a maximum solids content of 59.34% by weight, applying an overall control efficiency of 99% and a transfer efficiency of 40%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

- d. This emissions unit becomes subject to OAC rule 3745-21-09(U)(d)(1) when a coating is applied to a metal substrate.
- e. The potential to emit for this emissions unit is less than the allowable emission limitation [See b)(2)c.].
- f. The hourly and ton per year VOC emission limitations represent the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- g. This emissions unit is subject to 38.82 lbs VOC/hr from coating operations at all times except for when subject to OAC rule 3745-21-07(G)(2) as specified in section b)(2)h.
- h. This emissions unit becomes subject to OAC rule 3745-21-07(G)(2) for each day when any photochemically reactive material is applied to any non-metal substrate. On any such day, all emissions from both the application of photochemically reactive and non-photochemically reactive materials (coatings) on non-metal substrates is applicable to the requirement that OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.
- i. On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have 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 rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07 (G) (2) still exists as part of the federally-approved SIP of Ohio.
- j. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- k. The permittee shall operate the dry particulate filter system whenever this emissions unit is in operation.
- l. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.



- m. This facility is applicable to both the Surface Coating of Plastic Parts and Products MACT (40 CFR, Part 63, Subpart PPPP) and the Surface Coating of Miscellaneous Metal Parts and Products MACT (40 CFR, Part 63, Subpart MMMM). In accordance with the rule, the company chooses to have all applicable surface coating operations comply with the emissions limits set forth in Subpart PPPP since the coating of plastic parts is the predominant activity at the facility.
- n. The permittee has elected to use either the compliance option provided by 40 CFR 63.4491(a) [compliant material option] or 40 CFR 63.4491(b) [emission rate without add-on controls option]. This is accomplished by demonstrating that the organic HAP emissions rate for the coating operation is less than or equal to the applicable emission limit in 63.4490, calculated as a rolling 12-month emissions rate and determined on a monthly basis. The permittee must meet all of the requirements of 63.4540, 63.4541 and 63.4542 for the compliant material option, if this option is chosen, or 63.4550, 63.4551, and 63.4552 for the emission rate without add-on controls option, if this option is chosen, to demonstrate compliance with the emissions limit. The permittee is required to notify the Ohio EPA, Northwest District Office prior to the use of another compliance option as identified in 40 CFR 63.4491.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coating employed in emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 240$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating employed

G_i = Gallons used of each coating for the rolling 12-month period

n = total number of unique coatings employed in emission units K001, K028 through K032, K034, K039, K040, K041, K043 and K044

Compliance with the annual restriction on the amount of coatings shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17378]

- (2) The use of volatile organic compounds, as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.

[OAC rule 3745-77-07(A)(1) and PTI #03-17378]



- (3) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

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

- (4) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records that document whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (2) The permittee shall maintain monthly records of the following information for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044 combined:

- a. the company name and identification for each coating employed;
- b. the volume, in gallons, of each coating employed;
- c. the VOC content of each coating employed, in pounds per gallon, as applied;
- d. the VOC emission rate, in pounds, for each coating employed [c)(2)b. x c)(2)c.];
- e. the total VOC emission rate from all coatings employed [summation of c)(2)d.], in pounds or tons;
- f. the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (3) The permittee shall maintain monthly records of the following information for cleanup materials employed in emissions unit K034:

- a. the company name and identification for each cleanup material employed;
- b. the volume, in gallons, of each cleanup material employed;
- c. the OC content of each cleanup material employed, in pounds per gallon;
- d. the OC emission rate, in pounds, for each cleanup material employed [c)(3)b. x c)(3)c.]; and



- e. the total OC emissions rate from all cleanup materials employed [summation of c)(3)d.], in pounds or tons.

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (4) On any day when any photochemically reactive material is applied to any non-metal substrate, the permittee shall collect and record the following information for this emissions unit for such day:

- a. The company name and identification for each coating employed on a non-metal substrate;
- b. The number of gallons of each coating applied on a non-metal substrate;
- c. The organic compound content of each coating, in pounds/gallon, as applied on any non-metal substrate;
- d. The total organic compound emission rate for all coatings applied on a non-metal substrate, in pounds per day [c)(4)b. x c)(4)c.];
- e. The total number of hours the emissions unit was involved in the operation of coating of non-metal substrates; and
- f. The average hourly organic compound emission rate involving the operation of coating non-metal substrates [c)(4)d./c)(4)e.], in pounds per hour (average).

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (5) The permittee shall collect and record the following information when any coating is applied to a metal substrate:

- a. The company name and identification for each coating employed on a metal substrate; and
- b. The VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, employed on any metal substrate. The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (6) In conjunction with the monitoring and recordkeeping in c)(4) above, the permittee shall collect and record the following information each month for all cleanup materials employed in emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined:



- a. the volume, in gallons, of each cleanup material employed;
- b. the OC content of each cleanup material employed, in pounds per gallon;
- c. the OC emission rate, in pounds, for each cleanup material employed [c)(6)a. x c)(6)b.];
- d. the total OC emissions rate from all cleanup materials employed [summation of c)(6)c.], in pounds or tons; and
- e. the annual year-to-date OC emissions from all cleanup materials employed [sum of c)(6)d. for each calendar month to date from January to December].

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

- (8) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

- (9) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

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

- (10) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;



- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

- (11) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

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

- (12) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart PPPP (the predominant activity at the facility), including the following sections:

63.4530	Records that must be kept
63.4531	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR, Part 63, Subpart PPPP]

e) Reporting Requirements

- (1) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01 and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the event occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- (2) The permittee shall notify the Northwest District Office in writing of any daily record showing that the VOC content exceeded the limitation of 3.5 pounds VOC per gallon minus water and exempt solvents that is applicable when applying a coating to a metal substrate. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:



- a. All exceedances of the 240 tons of VOC per rolling, 12-month period for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined;
- b. Any exceedance of the monthly or annual cleanup material emissions limitations specified in Section b)(1)a. of this permit;
- c. For the days during which a photochemically reactive material was applied to a non-metal substrate, an identification of each day during which the average hourly organic compound emissions as calculated by term and condition c)(4)f. exceeded 8 pounds per hour; and
- d. For the days during which a photochemically reactive material was applied to a non-metal substrate, an identification of each day during which the average daily organic compound emissions as calculated by term and condition c)(4)d. exceeded 40 pounds per day.
- e. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer=s recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- (4) 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 PPPP, per the following sections:

63.4510	Notifications that must be submitted
63.4520	Reports that must be submitted

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR, Part 63, Subpart PPPP]

f) Testing Requirements

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

- a. Emission Limitation: 38.82 lbs VOC/hr & 170.03 tons VOC/yr from coating operations

Applicable Compliance Method: The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 6.0 gallons per hour and a maximum VOC content of 6.47 lbs/gallon.



The ton per year emission limitation was developed by multiplying the emission limitation of 38.82 lbs VOC/hr by a maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- b. Emission Limitation: 240 tons VOC/rolling, 12-month period from coating operations for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section c)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- c. Emission Limitation: 3.5 pounds VOC per gallon coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section c)(5) of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- d. Emission Limitation: 3.40 lbs PE/hr

Applicable Compliance Method: The potential to emit for this emissions unit is less than the allowable emissions limitation. The following calculation of the potential to emit shall demonstrate compliance:

The potential to emit for this emissions unit is 0.71 ton per year and was determined by multiplying a maximum coating usage rate of 6.0 gallons/hr, a maximum paint density of 11.32 lbs/gallon, a maximum solids content of 59.34% by weight, applying an overall control efficiency of 99% and a transfer efficiency of 40%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- e. Emission Limitation: Visible particulate emissions shall not exceed 20% opacity as a 6-minute average except as provided by rule

Applicable Compliance Method: If required, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]



- f. Emission Limitation: 163.43 lbs OC/month from cleanup operations

Applicable Compliance Method: Compliance shall be based on the recordkeeping in section c)(3) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]
- g. Emission Limitation: 8.19 tons OC/yr from cleanup operations for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined

Applicable Compliance Method: Compliance shall be based on the recordkeeping in section c)(6) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]
- h. Emission Limitation: OC emissions shall not exceed 8 pounds per hour and 40 pounds per day

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section c)(4) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]
- i. Emission Limitation: For each existing general use coating affected source, limit organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period

Applicable Compliance Method: The permittee shall demonstrate compliance with this limitation based upon the record keeping requirements specified in section d)(12) and the compliance requirements and test requirements specified in section f)(2) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR Part 63, Subpart PPPP]

(2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart PPPP, including the following sections:

63.4500	General requirements for complying with this subpart
63.4540	Compliance Requirements for the Compliant Material Option – By what date must I conduct the initial compliance demonstration*
63.4541	Compliance Requirements for the Compliant Material Option – How do I demonstrate initial compliance with the emission limitations*
63.4542	Compliance Requirements for the Compliant Material Option – How do I demonstrate continuous compliance with the emission limitations*
63.4550	Compliance Requirements for the Emission Rate Without Add-On Controls – By what date must I conduct the initial compliance demonstration*
63.4551	Compliance Requirements for the Emission Rate Without Add-On Controls – How do I demonstrate initial compliance with the emission limitations*
63.4552	Compliance Requirements for the Emission Rate Without Add-On Controls – How do I demonstrate continuous compliance with the emission limitations*



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Preliminary Proposed Title V Permit

Permit Number: P0087765

Facility ID: 0386000027

Effective Date: To be entered upon final issuance

*The permittee has elected to use either the compliance option provided by 40 CFR 63.4491(a) [compliant material option] or 40 CFR 63.4491(b) [emission rate without add-on controls option]. The permittee must meet all of the requirements of 63.4540, 63.4541 and 63.4542 for the compliant material option, if this option is chosen, or 63.4550, 63.4551, and 63.4552 for the emission rate without add-on controls option, if this option is chosen, to demonstrate compliance with the emissions limit [See b)(2)n.].

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR, Part 63, Subpart PPPP]

g) Miscellaneous Requirements

(1) None.



2. K039, Test Paint Booth

Operations, Property and/or Equipment Description:

Test spray booth. Modification to PTI 03-10757 issued on 1/28/04 to allow for increase in emissions and federally enforceable emission limitations.

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 #03-17378, issued 6/3/08]	6.47 lbs volatile organic compounds (VOC)/hr and 28.34 tons VOC/yr from coating operations [See b)(2)e. and b)(2)f.] 6.59 lbs organic compounds (OC)/month from cleanup operations 8.19 tons OC/yr from cleanup operations for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined See b)(2)a. and c)(2)
b.	OAC rule 3745-31-05(D) [PTI #03-17378, issued 6/3/08]	240 tons VOC/rolling, 12-month period from coating operations for emission units K001, K028 through K032, K034, K039, K040, K041, K043 and K044 combined See b)(2)b., b)(2)c., c)(1) and c)(2)
c.	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day [See b)(2)g. and b)(2)h.]
d.	OAC rule 3745-21-09(U)(1)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit [See b)(2)d.]
e.	OAC rule 3745-17-07(A)	See b)(2)i and b)(2)j.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-17-11(B)	See b)(2)j. and b)(2)k.
g.	OAC rule 3745-17-11(C)	See b)(2)l., b)(2)m. c)(3), c)(4), d)(7) through d)(11), e)(4)
h.	40 CFR, Part 63, Subpart MMMM [63.3880 through 63.3981]	See b)(2)n.
i.	40 CFR, Part 63, Subpart PPPP [63.4480 through 63.4581] In accordance with 40 CFR 63.4482(e), this emission unit is an existing affected source at a plastic parts and products surface coating facility.]	See b)(2)n. For each existing general use coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period [63.4490(b)(1)] See b)(2)o., d)(12), e)(4) and f)(2)
j.	40 CFR, Part 63.1 – 15 (40 CFR 63.4501)	Table 2 of Subpart PPPP of 40 CFR Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d), OAC rule 3745-21-07(G)(2), and OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD) regulations:
 - 240 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K028 through K032, K034, K039 K040, K041, K043 and K044 combined [See c)(1)].
- c. Permit to Install 03-17378 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3754-31-05 (A) (3):
 - i. use of dry filtration system with a minimum control efficiency of 99% for particulate emissions.

The potential to emit for this emissions unit is 0.13 ton PE per year and was determined by multiplying a maximum coating usage rate of 1 gallon/hr, a maximum paint density of 11.32 lbs/gallon, a maximum solids content of 59.34%



by weight, applying an overall control efficiency of 99% and a transfer efficiency of 40%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

- d. This emissions unit becomes subject to OAC rule 3745-21-09(U)(d)(1) when a coating is applied to a metal substrate.
- e. The hourly and ton per year VOC emission limitations represent the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- f. This emissions unit is subject to 6.47 lbs VOC/hr from coating operations at all times except for when subject to OAC rule 3745-21-07(G)(2) as specified in section b)(2)g.
- g. This emissions unit becomes subject to OAC rule 3745-21-07(G)(2) for each day when any photochemically reactive material is applied to any non-metal substrate. On any such day, all emissions from both the application of photochemically reactive and non-photochemically reactive materials (coatings) on non-metal substrates is applicable to the requirement that OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.
- h. On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have 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 rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07 (G) (2) still exists as part of the federally-approved SIP of Ohio.
- i. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.
- j. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11 (C) as a revision to the Ohio SIP for particulate emissions.
- k. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).
- l. The permittee shall operate the dry particulate filter system whenever this emissions unit is in operation.
- m. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA



approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

- n. This facility is applicable to both the Surface Coating of Plastic Parts and Products MACT (40 CFR, Part 63, Subpart PPPP) and the Surface Coating of Miscellaneous Metal Parts and Products MACT (40 CFR, Part 63, Subpart MMMM). In accordance with the rule, the company chooses to have all applicable surface coating operations comply with the emissions limits set forth in Subpart PPPP since the coating of plastic parts is the predominant activity at the facility.
- o. The permittee has elected to use either the compliance option provided by 40 CFR 63.4491(a) [compliant material option] or 40 CFR 63.4491(b) [emission rate without add-on controls option]. This is accomplished by demonstrating that the organic HAP emissions rate for the coating operation is less than or equal to the applicable emission limit in 63.4490, calculated as a rolling 12-month emissions rate and determined on a monthly basis. The permittee must meet all of the requirements of 63.4540, 63.4541 and 63.4542 for the compliant material option, if this option is chosen, or 63.4550, 63.4551, and 63.4552 for the emission rate without add-on controls option, if this option is chosen, to demonstrate compliance with the emissions limit. The permittee is required to notify the Ohio EPA, Northwest District Office prior to the use of another compliance option as identified in 40 CFR 63.4491.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coating employed in emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 240$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating employed

G_i = Gallons used of each coating for the rolling 12-month period

n = total number of unique coatings employed in emission units K001, K028 through K032, K034, K039, K040, K041, K043 and K044

Compliance with the annual restriction on the amount of coatings shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17378]

- (2) The use of volatile organic compounds, as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.



[OAC rule 3745-77-07(A)(1) and PTI #03-17378]

- (3) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

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

- (4) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records that document whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (2) The permittee shall maintain monthly records of the following information for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044 combined:
 - a. the company name and identification for each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon, as applied;
 - d. the VOC emission rate, in pounds, for each coating employed [c)(2)b. x c)(2)c.];
 - e. the total VOC emission rate from all coatings employed [summation of c)(2)d.], in pounds or tons;
 - f. the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (3) The permittee shall maintain monthly records of the following information for cleanup materials employed in emissions unit K039:
 - a. the company name and identification for each cleanup material employed;
 - b. the volume, in gallons, of each cleanup material employed;
 - c. the OC content of each cleanup material employed, in pounds per gallon;



- d. the OC emission rate, in pounds, for each cleanup material employed [c)(3)b. x c)(3)c.]; and
- e. the total OC emissions rate from all cleanup materials employed [summation of c)(3)d.], in pounds or tons.

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (4) On any day when any photochemically reactive material is applied to any non-metal substrate, the permittee shall collect and record the following information for this emissions unit for such day:
 - a. The company name and identification for each coating employed on a non-metal substrate;
 - b. The number of gallons of each coating applied on a non-metal substrate;
 - c. The organic compound content of each coating, in pounds/gallon, as applied on any non-metal substrate;
 - d. The total organic compound emission rate for all coatings applied on a non-metal substrate, in pounds per day [c)(4)b. x c)(4)c.];
 - e. The total number of hours the emissions unit was involved in the operation of coating of non-metal substrates; and
 - f. The average hourly organic compound emission rate involving the operation of coating non-metal substrates [c)(4)d./c)(4)e.], in pounds per hour (average).

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (5) The permittee shall collect and record the following information when any coating is applied to a metal substrate:
 - a. The company name and identification for each coating employed on a metal substrate; and
 - b. The VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, employed on any metal substrate. The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (6) In conjunction with the monitoring and recordkeeping in c)(4) above, the permittee shall collect and record the following information each month for all cleanup materials



employed in emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined:

- a. the volume, in gallons, of each cleanup material employed;
- b. the OC content of each cleanup material employed, in pounds per gallon;
- c. the OC emission rate, in pounds, for each cleanup material employed [c)(6)a. x c)(6)b.];
- d. the total OC emissions rate from all cleanup materials employed [summation of c)(6)c.], in pounds or tons; and
- e. the annual year-to-date OC emissions from all cleanup materials employed [sum of c)(6)d. for each calendar month to date from January to December].

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

- (8) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer=s recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer=s recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

- (9) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

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

- (10) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:



- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

- (11) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

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

- (12) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart PPPP (the predominant activity at the facility), including the following sections:

63.4530	Records that must be kept
63.4531	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR, Part 63, Subpart PPPP]

e) Reporting Requirements

- (1) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01 and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the event occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- (2) The permittee shall notify the Northwest District Office in writing of any daily record showing that the VOC content exceeded the limitation of 3.5 pounds VOC per gallon minus water and exempt solvents that is applicable when applying a coating to a metal substrate. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]



- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the 240 tons of VOC per rolling, 12-month period for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined;
 - b. Any exceedance of the monthly or annual cleanup material emissions limitations specified in Section b)(1)a. of this permit;
 - c. For the days during which a photochemically reactive material was applied to a non-metal substrate, an identification of each day during which the average hourly organic compound emissions as calculated by term and condition c)(4)f. exceeded 8 pounds per hour; and
 - d. For the days during which a photochemically reactive material was applied to a non-metal substrate, an identification of each day during which the average daily organic compound emissions as calculated by term and condition c)(4)d. exceeded 40 pounds per day.
 - e. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer=s recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- (4) 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 PPPP, per the following sections:

63.4510	Notifications that must be submitted
63.4520	Reports that must be submitted

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR, Part 63, Subpart PPPP]

f) Testing Requirements

- (1) Compliance with the emission limitations specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 6.47 lbs VOC/hr and 28.34 tons VOC/yr from coating operations

Applicable Compliance Method: The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.



*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 1.0 gallon per hour and a maximum VOC content of 6.47 lbs/gallon.

The ton per year emission limitation was developed by multiplying the emission limitation of 6.47 lbs VOC/hr by a maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the allowable VOC emission limitations above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- b. Emission Limitation: 240 tons VOC/rolling, 12-month period from coating operations for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section c)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- c. Emission Limitation: 3.5 pounds VOC per gallon coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section c)(5) of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- d. Emission Limitation: 6.59 lbs OC/month from cleanup operations

Applicable Compliance Method: Compliance shall be based on the recordkeeping in section c)(3) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- e. Emission Limitation: 8.19 tons OC/yr from cleanup operations for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined

Applicable Compliance Method: Compliance shall be based on the recordkeeping in section c)(6) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- f. Emission Limitation: OC emissions shall not exceed 8 pounds per hour and 40 pounds per day

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section c)(4) of this permit.



[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- g. Emission Limitation: For each existing general use coating affected source, limit organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period

Applicable Compliance Method: The permittee shall demonstrate compliance with this limitation based upon the record keeping requirements specified in section d)(12) and the compliance requirements and test requirements specified in section f)(2) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR Part 63, Subpart PPPP]

- (2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart PPPP, including the following sections:

63.4500	General requirements for complying with this subpart
63.4540	Compliance Requirements for the Compliant Material Option – By what date must I conduct the initial compliance demonstration*
63.4541	Compliance Requirements for the Compliant Material Option – How do I demonstrate initial compliance with the emission limitations*
63.4542	Compliance Requirements for the Compliant Material Option – How do I demonstrate continuous compliance with the emission limitations*
63.4550	Compliance Requirements for the Emission Rate Without Add-On Controls – By what date must I conduct the initial compliance demonstration*
63.4551	Compliance Requirements for the Emission Rate Without Add-On Controls – How do I demonstrate initial compliance with the emission limitations*
63.4552	Compliance Requirements for the Emission Rate Without Add-On Controls – How do I demonstrate continuous compliance with the emission limitations*

*The permittee has elected to use either the compliance option provided by 40 CFR 63.4491(a) [compliant material option] or 40 CFR 63.4491(b) [emission rate without add-on controls option]. The permittee must meet all of the requirements of 63.4540, 63.4541 and 63.4542 for the compliant material option, if this option is chosen, or 63.4550, 63.4551, and 63.4552 for the emission rate without add-on controls option, if this option is chosen, to demonstrate compliance with the emissions limit [See b)(2)o].

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR, Part 63, Subpart PPPP]

- g) Miscellaneous Requirements

- (1) None.



3. K041, B-Line Paint Booth

Operations, Property and/or Equipment Description:

B-line paint booth. Modification to PTI 03-10757 issued on 1/28/04 to allow for increase in emissions and federally enforceable emission limitations.

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 #03-17378, issued 6/3/08]	45.29 lbs volatile organic compounds (VOC)/hr and 198.37 tons VOC/yr from coating operations [See b)(2)f. and b)(2)g.] 16.48 lbs organic compounds (OC)/month from cleanup operations 8.19 tons OC/yr from cleanup operations for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined See b)(2)a. and c)(2)
b.	OAC rule 3745-31-05(D) [PTI #03-17378, issued 6/3/08]	240 tons VOC/rolling, 12-month period from coating operations for emission units K001, K028 through K032, K034, K039, K040, K041, K043 and K044 combined See b)(2)b., b)(2)c., c)(1) and c)(2)
c.	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day [See b)(2)h. and b)(2)i.]
d.	OAC rule 3745-21-09(U)(1)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit [See b)(2)d.]
e.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		not exceed 20% opacity as a 6-minute average except, as provided by rule See b)(2)j.
f.	OAC rule 3745-17-11(B)	3.82 lbs PE/hr See b)(2)e. and b)(2)j.
g.	OAC rule 3745-17-11(C)	See b)(2)k., b)(2)l. c)(3), c)(4), d)(7) through d)(11), e)(4)
h.	40 CFR, Part 63, Subpart MMMM [63.3880 through 63.3981]	See b)(2)m.
i.	40 CFR, Part 63, Subpart PPPP [63.4480 through 63.4581] In accordance with 40 CFR 63.4482(e), this emission unit is an existing affected source at a plastic parts and products surface coating facility.]	See b)(2)m. For each existing general use coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period [63.4490(b)(1)] See b)(2)n., d)(12), e)(4) and f)(2)
j.	40 CFR, Part 63.1 – 15 (40 CFR 63.4501)	Table 2 of Subpart PPPP of 40 CFR Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d), OAC rule 3745-21-07(G)(2), and OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD) regulations:
 - i. 240 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K028 through K032, K034, K039 K040, K041, K043 and K044 combined [See c)(1)].
- c. Permit to Install 03-17378 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3754-31-05(A) (3):



- i. use of dry filtration system with a minimum control efficiency of 99% for particulate emissions.

The potential to emit for this emissions unit is 0.83 ton PE per year and was determined by multiplying a maximum coating usage rate of 7.0 gallons/hr, a maximum paint density of 11.32 lbs/gallon, a maximum solids content of 59.34% by weight, applying an overall control efficiency of 99% and a transfer efficiency of 40%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

- d. This emissions unit becomes subject to OAC rule 3745-21-09(U)(d)(1) when a coating is applied to a metal substrate.
- e. The potential to emit for this emissions unit is less than the allowable emission limitation [See b)(2)c.].
- f. The hourly and ton per year VOC emission limitations represent the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- g. This emissions unit is subject to 45.29 lbs VOC/hr from coating operations at all times except for when subject to OAC rule 3745-21-07(G)(2) as specified in section b)(2)h.
- h. This emissions unit becomes subject to OAC rule 3745-21-07(G)(2) for each day when any photochemically reactive material is applied to any non-metal substrate. On any such day, all emissions from both the application of photochemically reactive and non-photochemically reactive materials (coatings) on non-metal substrates is applicable to the requirement that OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.
- i. On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have 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 rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07 (G) (2) still exists as part of the federally-approved SIP of Ohio.
- j. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- k. The permittee shall operate the dry particulate filter system whenever this emissions unit is in operation.
- l. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA



approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

- m. This facility is applicable to both the Surface Coating of Plastic Parts and Products MACT (40 CFR, Part 63, Subpart PPPP) and the Surface Coating of Miscellaneous Metal Parts and Products MACT (40 CFR, Part 63, Subpart MMMM). In accordance with the rule, the company chooses to have all applicable surface coating operations comply with the emissions limits set forth in Subpart PPPP since the coating of plastic parts is the predominant activity at the facility.
- n. The permittee has elected to use either the compliance option provided by 40 CFR 63.4491(a) [compliant material option] or 40 CFR 63.4491(b) [emission rate without add-on controls option]. This is accomplished by demonstrating that the organic HAP emissions rate for the coating operation is less than or equal to the applicable emission limit in 63.4490, calculated as a rolling 12-month emissions rate and determined on a monthly basis. The permittee must meet all of the requirements of 63.4540, 63.4541 and 63.4542 for the compliant material option, if this option is chosen, or 63.4550, 63.4551, and 63.4552 for the emission rate without add-on controls option, if this option is chosen, to demonstrate compliance with the emissions limit. The permittee is required to notify the Ohio EPA, Northwest District Office prior to the use of another compliance option as identified in 40 CFR 63.4491.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coating employed in emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 240$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating employed

G_i = Gallons used of each coating for the rolling 12-month period

n = total number of unique coatings employed in emission units K001, K028 through K032, K034, K039, K040, K041, K043 and K044

Compliance with the annual restriction on the amount of coatings shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17378]

- (2) The use of volatile organic compounds, as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.



[OAC rule 3745-77-07(A)(1) and PTI #03-17378]

- (3) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

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

- (4) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records that document whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (2) The permittee shall maintain monthly records of the following information for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044 combined:
 - a. the company name and identification for each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon, as applied;
 - d. the VOC emission rate, in pounds, for each coating employed [c)(2)b. x c)(2)c.];
 - e. the total VOC emission rate from all coatings employed [summation of c)(2)d.], in pounds or tons;
 - f. the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (3) The permittee shall maintain monthly records of the following information for cleanup materials employed in emissions unit K041:
 - a. the company name and identification for each cleanup material employed;
 - b. the volume, in gallons, of each cleanup material employed;
 - c. the OC content of each cleanup material employed, in pounds per gallon;



- d. the OC emission rate, in pounds, for each cleanup material employed [c)(3)b. x c)(3)c.]; and
- e. the total OC emissions rate from all cleanup materials employed [summation of c)(3)d.], in pounds or tons.

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (4) On any day when any photochemically reactive material is applied to any non-metal substrate, the permittee shall collect and record the following information for this emissions unit for such day:
 - a. The company name and identification for each coating employed on a non-metal substrate;
 - b. The number of gallons of each coating applied on a non-metal substrate;
 - c. The organic compound content of each coating, in pounds/gallon, as applied on any non-metal substrate;
 - d. The total organic compound emission rate for all coatings applied on a non-metal substrate, in pounds per day [c)(4)b. x c)(4)c.];
 - e. The total number of hours the emissions unit was involved in the operation of coating of non-metal substrates; and
 - f. The average hourly organic compound emission rate involving the operation of coating non-metal substrates [c)(4)d./c)(4)e.], in pounds per hour (average).

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (5) The permittee shall collect and record the following information when any coating is applied to a metal substrate:
 - a. The company name and identification for each coating employed on a metal substrate; and
 - b. The VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, employed on any metal substrate. The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (6) In conjunction with the monitoring and recordkeeping in c)(4) above, the permittee shall collect and record the following information each month for all cleanup materials



employed in emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined:

- a. the volume, in gallons, of each cleanup material employed;
- b. the OC content of each cleanup material employed, in pounds per gallon;
- c. the OC emission rate, in pounds, for each cleanup material employed [c)(6)a. x c)(6)b.];
- d. the total OC emissions rate from all cleanup materials employed [summation of c)(6)c.], in pounds or tons; and
- e. the annual year-to-date OC emissions from all cleanup materials employed [sum of c)(6)d. for each calendar month to date from January to December].

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

- (8) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer=s recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer=s recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

- (9) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

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

- (10) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:



- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

- (11) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

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

- (12) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart PPPP (the predominant activity at the facility), including the following sections:

63.4530	Records that must be kept
63.4531	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR, Part 63, Subpart PPPP]

e) Reporting Requirements

- (1) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01 and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the event occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- (2) The permittee shall notify the Northwest District Office in writing of any daily record showing that the VOC content exceeded the limitation of 3.5 pounds VOC per gallon minus water and exempt solvents that is applicable when applying a coating to a metal substrate. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]



- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the 240 tons of VOC per rolling, 12-month period for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined;
 - b. Any exceedance of the monthly or annual cleanup material emissions limitations specified in Section b)(1)a. of this permit;
 - c. For the days during which a photochemically reactive material was applied to a non-metal substrate, an identification of each day during which the average hourly organic compound emissions as calculated by term and condition c)(4)f. exceeded 8 pounds per hour; and
 - d. For the days during which a photochemically reactive material was applied to a non-metal substrate, an identification of each day during which the average daily organic compound emissions as calculated by term and condition c)(4)d. exceeded 40 pounds per day.
 - e. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer=s recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- (4) 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 PPPP, per the following sections:

63.4510	Notifications that must be submitted
63.4520	Reports that must be submitted

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR, Part 63, Subpart PPPP]

f) Testing Requirements

- (1) Compliance with the emission limitations specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 45.29 lbs VOC/hr and 198.37 tons VOC/yr from coating operations

Applicable Compliance Method: The hourly and annual emission limitations represent the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.



*The hourly potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 7 gallons per hour and a maximum VOC content of 6.47 lbs/gallon.

The ton per year emission limitation was developed by multiplying the emission limitation of 45.29 lbs VOC/hr by a maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the allowable VOC emission limitations above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- b. Emission Limitation: 240 tons VOC/rolling, 12-month period from coating operations for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section c)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- c. Emission Limitation: 3.5 pounds VOC per gallon coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section c)(5) of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- d. Emission Limitation: 3.82 lbs PE/hr

Applicable Compliance Method: The potential to emit for this emissions unit is less than the allowable emissions limitation. The following calculation of the potential to emit shall demonstrate compliance:

The potential to emit for this emissions unit is 0.83 ton per year and was determined by multiplying a maximum coating usage rate of 7.0 gallons/hr, a maximum paint density of 11.32 lbs/gallon, a maximum solids content of 59.34% by weight, applying an overall control efficiency of 99% and a transfer efficiency of 40%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- e. Emission Limitation: Visible particulate emissions shall not exceed 20% opacity as a 6-minute average except as provided by rule



Applicable Compliance Method: If required, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- f. Emission Limitation: 16.48 lbs OC/month from cleanup operations

Applicable Compliance Method: Compliance shall be based on the recordkeeping in section c)(3) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- g. Emission Limitation: 8.19 tons OC/yr from cleanup operations for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined

Applicable Compliance Method: Compliance shall be based on the recordkeeping in section c)(6) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- h. Emission Limitation: OC emissions shall not exceed 8 pounds per hour and 40 pounds per day

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section c)(4) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- i. Emission Limitation: For each existing general use coating affected source, limit organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period

Applicable Compliance Method: The permittee shall demonstrate compliance with this limitation based upon the record keeping requirements specified in section d)(12) and the compliance requirements and test requirements specified in section f)(2) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR Part 63, Subpart PPPP]

- (2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart PPPP, including the following sections:

63.4500	General requirements for complying with this subpart
63.4540	Compliance Requirements for the Compliant Material Option – By what date must I conduct the initial compliance demonstration*
63.4541	Compliance Requirements for the Compliant Material Option – How do I demonstrate initial compliance with the emission limitations*
63.4542	Compliance Requirements for the Compliant Material Option – How do I demonstrate continuous compliance with the emission limitations*
63.4550	Compliance Requirements for the Emission Rate Without Add-On Controls – By what date must I conduct the initial compliance demonstration*



63.4551	Compliance Requirements for the Emission Rate Without Add-On Controls – How do I demonstrate initial compliance with the emission limitations*
63.4552	Compliance Requirements for the Emission Rate Without Add-On Controls – How do I demonstrate continuous compliance with the emission limitations*

*The permittee has elected to use either the compliance option provided by 40 CFR 63.4491(a) [compliant material option] or 40 CFR 63.4491(b) [emission rate without add-on controls option]. The permittee must meet all of the requirements of 63.4540, 63.4541 and 63.4542 for the compliant material option, if this option is chosen, or 63.4550, 63.4551, and 63.4552 for the emission rate without add-on controls option, if this option is chosen, to demonstrate compliance with the emissions limit [See b)(2)n.].

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR, Part 63, Subpart PPPP]

g) Miscellaneous Requirements

- (1) None.



4. Emissions Unit Group - Group #1: K001, K028, K029, K030, K031, K032,

EU ID	Operations, Property and/or Equipment Description
K001	A-line paint booth 6. Modification to PTI 03-10757 issued on 1/28/04 to allow for increase in emissions and federally enforceable emission limitations.
K028	A-line paint booth 1. Modification to PTI 03-10757 issued on 1/28/04 to allow for increase in emissions and federally enforceable emission limitations.
K029	A-line paint booth 2. Modification to PTI 03-10757 issued on 1/28/04 to allow for increase in emissions and federally enforceable emission limitations.
K030	A-line paint booth 3. Modification to PTI 03-10757 issued on 1/28/04 to allow for increase in emissions and federally enforceable emission limitations.
K031	A-line paint booth 4. Modification to PTI 03-10757 issued on 1/28/04 to allow for increase in emissions and federally enforceable emission limitations.
K032	A-line paint booth 5. Modification to PTI 03-10757 issued on 1/28/04 to allow for increase in emissions and federally enforceable emission limitations.

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 #03-17378, issued 6/3/08]	61.47 lbs volatile organic compounds (VOC)/hr from coating operations from each emissions unit [See b)(2)f. and b)(2)g.] 163.43 lbs organic compounds (OC)/month from cleanup operations from each emissions unit 8.19 tons OC/yr from cleanup operations for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined See b)(2)a. and c)(2)
b.	OAC rule 3745-31-05(D) [PTI #03-17378, issued 6/3/08]	240 tons VOC/rolling, 12-month period from coating operations for emission units K001, K028 through K032, K034, K039, K040, K041, K043 and K044 combined



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)b., b)(2)c., c)(1) and c)(2)
c.	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from each emissions unit [See b)(2)h. and b)(2)i.]
d.	OAC rule 3745-21-09(U)(1)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit [See b)(2)d.]
e.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity as a 6-minute average except, as provided by rule from each emissions unit See b)(2)j.
f.	OAC rule 3745-17-11(B)	4.80 lbs PE/hr from each emissions unit See b)(2)e. and b)(2)j.
g.	OAC rule 3745-17-11(C)	See b)(2)k., b)(2)l. c)(3), c)(4), d)(7) through d)(11), e)(4)
h.	40 CFR, Part 63, Subpart Mmmm [63.3880 through 63.3981]	See b)(2)m.
i.	40 CFR, Part 63, Subpart Pppp [63.4480 through 63.4581] In accordance with 40 CFR 63.4482(e), this emission unit is an existing affected source at a plastic parts and products surface coating facility.]	See b)(2)m. For each existing general use coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period from each emissions unit [63.4490(b)(1)] See b)(2)n., d)(12), e)(4) and f)(2)
j.	40 CFR, Part 63.1 – 15 (40 CFR 63.4501)	Table 2 of Subpart Pppp of 40 CFR Part 63 – Applicability of General Provisions to Subpart Pppp shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d), OAC rule 3745-21-07(G)(2), and OAC rule 3745-31-05(D).



- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD) regulations:
 - i. 240 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K028 through K032, K034, K039 K040, K041, K043 and K044 combined [See c)(1)].
- c. Permit to Install 03-17378 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3754-31-05(A) (3):
 - i. use of dry filtration system with a minimum control efficiency of 99% for particulate emissions.

The potential to emit for this emissions unit is 1.14 tons PE per year and was determined by multiplying a maximum coating usage rate of 9.5 gallons/hr, a maximum paint density of 11.32 lbs/gallon, a maximum solids content of 59.34% by weight, applying an overall control efficiency of 99% and a transfer efficiency of 40%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

- d. This emissions unit becomes subject to OAC rule 3745-21-09(U)(d)(1) when a coating is applied to a metal substrate.
- e. The potential to emit for this emissions unit is less than the allowable emission limitation [See b)(2)c.].
- f. The hourly VOC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- g. This emissions unit is subject to 61.47 lbs VOC/hr from coating operations at all times except for when subject to OAC rule 3745-21-07(G)(2) as specified in section b)(2)h.
- h. This emissions unit becomes subject to OAC rule 3745-21-07(G)(2) for each day when any photochemically reactive material is applied to any non-metal substrate. On any such day, all emissions from both the application of photochemically reactive and non-photochemically reactive materials (coatings) on non-metal substrates is applicable to the requirement that OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.
- i. On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have 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 rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07 (G) (2) still exists as part of the federally-approved SIP of Ohio.



- j. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- k. The permittee shall operate the dry particulate filter system whenever this emissions unit is in operation.
- l. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- m. This facility is applicable to both the Surface Coating of Plastic Parts and Products MACT (40 CFR, Part 63, Subpart PPPP) and the Surface Coating of Miscellaneous Metal Parts and Products MACT (40 CFR, Part 63, Subpart MMMM). In accordance with the rule, the company chooses to have all applicable surface coating operations comply with the emissions limits set forth in Subpart PPPP since the coating of plastic parts is the predominant activity at the facility.
- n. The permittee has elected to use either the compliance option provided by 40 CFR 63.4491(a) [compliant material option] or 40 CFR 63.4491(b) [emission rate without add-on controls option]. This is accomplished by demonstrating that the organic HAP emissions rate for the coating operation is less than or equal to the applicable emission limit in 63.4490, calculated as a rolling 12-month emissions rate and determined on a monthly basis. The permittee must meet all of the requirements of 63.4540, 63.4541 and 63.4542 for the compliant material option, if this option is chosen, or 63.4550, 63.4551, and 63.4552 for the emission rate without add-on controls option, if this option is chosen, to demonstrate compliance with the emissions limit. The permittee is required to notify the Ohio EPA, Northwest District Office prior to the use of another compliance option as identified in 40 CFR 63.4491.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coating employed in emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 240$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating employed

G_i = Gallons used of each coating for the rolling 12-month period



n = total number of unique coatings employed in emission units K001, K028 through K032, K034, K039, K040, K041, K043 and K044

Compliance with the annual restriction on the amount of coatings shall be based upon a rolling, 12-month summation.

[OAC rule 3745-77-07(A)(1) and PTI #03-17378]

- (2) The use of volatile organic compounds, as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.

[OAC rule 3745-77-07(A)(1) and PTI #03-17378]

- (3) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

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

- (4) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records that document whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (2) The permittee shall maintain monthly records of the following information for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044 combined:
 - a. the company name and identification for each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon, as applied;
 - d. the VOC emission rate, in pounds, for each coating employed [c)(2)b. x c)(2)c.];
 - e. the total VOC emission rate from all coatings employed [summation of c)(2)d.], in pounds or tons;
 - f. the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]



- (3) The permittee shall maintain monthly records of the following information for cleanup materials employed in each emissions unit:
- a. the company name and identification for each cleanup material employed;
 - b. the volume, in gallons, of each cleanup material employed;
 - c. the OC content of each cleanup material employed, in pounds per gallon;
 - d. the OC emission rate, in pounds, for each cleanup material employed [c)(3)b. x c)(3)c.]; and
 - e. the total OC emissions rate from all cleanup materials employed [summation of c)(3)d.], in pounds or tons.

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (4) On any day when any photochemically reactive material is applied to any non-metal substrate, the permittee shall collect and record the following information for each emissions unit for such day:
- a. The company name and identification for each coating employed on a non-metal substrate;
 - b. The number of gallons of each coating applied on a non-metal substrate;
 - c. The organic compound content of each coating, in pounds/gallon, as applied on any non-metal substrate;
 - d. The total organic compound emission rate for all coatings applied on a non-metal substrate, in pounds per day [c)(4)b. x c)(4)c.];
 - e. The total number of hours the emissions unit was involved in the operation of coating of non-metal substrates; and
 - f. The average hourly organic compound emission rate involving the operation of coating non-metal substrates [c)(4)d./c)(4)e.], in pounds per hour (average).

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (5) The permittee shall collect and record the following information when any coating is applied to a metal substrate in each emission unit:
- a. The company name and identification for each coating employed on a metal substrate; and



- b. The VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, employed on any metal substrate. The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (6) In conjunction with the monitoring and recordkeeping in c)(4) above, the permittee shall collect and record the following information each month for all cleanup materials employed in emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined:

- a. the volume, in gallons, of each cleanup material employed;
- b. the OC content of each cleanup material employed, in pounds per gallon;
- c. the OC emission rate, in pounds, for each cleanup material employed [c)(6)a. x c)(6)b.];
- d. the total OC emissions rate from all cleanup materials employed [summation of c)(6)c.], in pounds or tons; and
- e. the annual year-to-date OC emissions from all cleanup materials employed [sum of c)(6)d. for each calendar month to date from January to December].

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

- (8) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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



- (9) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

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

- (10) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

- (11) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

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

- (12) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart PPPP (the predominant activity at the facility), including the following sections:

63.4530	Records that must be kept
63.4531	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR, Part 63, Subpart PPPP]

e) Reporting Requirements

- (1) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01 and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the event occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]



- (2) The permittee shall notify the Northwest District Office in writing of any daily record showing that the VOC content exceeded the limitation of 3.5 pounds VOC per gallon minus water and exempt solvents that is applicable when applying a coating to a metal substrate. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the 240 tons of VOC per rolling, 12-month period for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined;
 - b. Any exceedance of the monthly or annual cleanup material emissions limitations specified in Section b)(1)a. of this permit;
 - c. For the days during which a photochemically reactive material was applied to a non-metal substrate, an identification of each day during which the average hourly organic compound emissions as calculated by term and condition c)(4)f. exceeded 8 pounds per hour; and
 - d. For the days during which a photochemically reactive material was applied to a non-metal substrate, an identification of each day during which the average daily organic compound emissions as calculated by term and condition c)(4)d. exceeded 40 pounds per day.
 - e. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer=s recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- (4) 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 PPPP, per the following sections:

63.4510	Notifications that must be submitted
63.4520	Reports that must be submitted

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR, Part 63, Subpart PPPP]

f) Testing Requirements

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



- a. Emission Limitation: 61.47 lbs VOC/hr from coating operations from each emissions unit

Applicable Compliance Method: The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 9.5 gallons per hour and a maximum VOC content of 6.47 lbs/gallon.

If required, the permittee shall demonstrate compliance with the allowable VOC emission limitations above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- b. Emission Limitation: 240 tons VOC/rolling, 12,-month period from coating operations for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section c)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- c. Emission Limitation: 3.5 pounds VOC per gallon coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section c)(5) of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- d. Emission Limitation: 4.80 lbs PE/hr from each emissions unit

Applicable Compliance Method: The potential to emit for this emissions unit is less than the allowable emissions limitation. The following calculation of the potential to emit shall demonstrate compliance:

The potential to emit for this emissions unit is 1.14 tons per year and was determined by multiplying a maximum coating usage rate of 9.5 gallons/hr, a maximum paint density of 11.32 lbs/gallon, a maximum solids content of 59.34% by weight, applying an overall control efficiency of 99% and a transfer efficiency of 40%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]



- e. Emission Limitation: Visible particulate emissions shall not exceed 20% opacity as a 6-minute average except as provided by rule from each emissions unit

Applicable Compliance Method: If required, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- f. Emission Limitation: 163.43 lbs OC/month from cleanup operations from each emissions unit

Applicable Compliance Method: Compliance shall be based on the recordkeeping in section c)(3) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- g. Emission Limitation: 8.19 tons OC/yr from cleanup operations for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined

Applicable Compliance Method: Compliance shall be based on the recordkeeping in section c)(6) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- h. Emission Limitation: OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from each emissions unit

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section c)(4) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- i. Emission Limitation: For each existing general use coating affected source, limit organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period from each emissions unit

Applicable Compliance Method: The permittee shall demonstrate compliance with this limitation based upon the record keeping requirements specified in section d)(12) and the compliance requirements and test requirements specified in section f)(2) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR Part 63, Subpart PPPP]

- (2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart PPPP, including the following sections:

63.4500	General requirements for complying with this subpart
63.4540	Compliance Requirements for the Compliant Material Option – By what date must I conduct the initial compliance demonstration*



63.4541	Compliance Requirements for the Compliant Material Option – How do I demonstrate initial compliance with the emission limitations*
63.4542	Compliance Requirements for the Compliant Material Option – How do I demonstrate continuous compliance with the emission limitations*
63.4550	Compliance Requirements for the Emission Rate Without Add-On Controls – By what date must I conduct the initial compliance demonstration*
63.4551	Compliance Requirements for the Emission Rate Without Add-On Controls – How do I demonstrate initial compliance with the emission limitations*
63.4552	Compliance Requirements for the Emission Rate Without Add-On Controls – How do I demonstrate continuous compliance with the emission limitations*

*The permittee has elected to use either the compliance option provided by 40 CFR 63.4491(a) [compliant material option] or 40 CFR 63.4491(b) [emission rate without add-on controls option]. The permittee must meet all of the requirements of 63.4540, 63.4541 and 63.4542 for the compliant material option, if this option is chosen, or 63.4550, 63.4551, and 63.4552 for the emission rate without add-on controls option, if this option is chosen, to demonstrate compliance with the emissions limit [See b)(2)n.].

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR, Part 63, Subpart PPPP]

g) Miscellaneous Requirements

- (1) None.



5. Emissions Unit Group - Group #2: K040, K043, K044,

EU ID	Operations, Property and/or Equipment Description
K040	D-line paint booth 1. Modification to PTI 03-10757 issued on 1/28/04 to allow for increase in emissions and federally enforceable emission limitations.
K043	D-line paint booth 2. Modification to PTI 03-10757 issued on 1/28/04 to allow for increase in emissions and federally enforceable emission limitations.
K044	D-line paint booth 3. Modification to PTI 03-10757 issued on 1/28/04 to allow for increase in emissions and federally enforceable emission limitations.

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 #03-17378, issued 6/3/08]	19.41 lbs volatile organic compounds (VOC)/hr and 85.02 tons VOC/yr from coating operations from each emissions unit [See b)(2)e. and b)(2)f.] 65.90 lbs organic compounds (OC)/month from cleanup operations from each emissions unit 8.19 tons OC/yr from cleanup operations for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined See b)(2)a. and c)(2)
b.	OAC rule 3745-31-05(D) [PTI #03-17378, issued 6/3/08]	240 tons VOC/rolling, 12-month period from coating operations for emission units K001, K028 through K032, K034, K039, K040, K041, K043 and K044 combined See b)(2)b., b)(2)c., c)(1) and c)(2)
c.	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from each emissions unit [See b)(2)g. and b)(2)h.]



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-21-09(U)(1)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit [See b)(2)d.]
e.	OAC rule 3745-17-07(A)	See b)(2)i. and b)(2)j.
f.	OAC rule 3745-17-11(B)	See b)(2)j. and b)(2)k.
g.	OAC rule 3745-17-11(C)	See b)(2)l., b)(2)m. c)(3), c)(4), d)(7) through d)(11), e)(4)
h.	40 CFR, Part 63, Subpart Mmmm [63.3880 through 63.3981]	See b)(2)n.
i.	40 CFR, Part 63, Subpart Pppp [63.4480 through 63.4581] In accordance with 40 CFR 63.4482(e), this emission unit is an existing affected source at a plastic parts and products surface coating facility.]	See b)(2)n. For each existing general use coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period from each emissions unit [63.4490(b)(1)] See b)(2)o., d)(12), e)(4) and f)(2)
j.	40 CFR, Part 63.1 – 15 (40 CFR 63.4501)	Table 2 of Subpart Pppp of 40 CFR Part 63 – Applicability of General Provisions to Subpart Pppp shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d), OAC rule 3745-21-07(G)(2), and OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD) regulations:
 - 240 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K028 through K032, K034, K039 K040, K041, K043 and K044 combined [See c)(1)].
- c. Permit to Install 03-17378 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3754-31-05 (A) (3):



- i. use of water curtain with a minimum control efficiency of 99% for particulate emissions.

The potential to emit for this emissions unit is 0.35 ton PE per year and was determined by multiplying a maximum coating usage rate of 3 gallon/hr, a maximum paint density of 11.32 lbs/gallon, a maximum solids content of 59.34% by weight, applying an overall control efficiency of 99% and a transfer efficiency of 40%, multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

- d. This emissions unit becomes subject to OAC rule 3745-21-09(U)(d)(1) when a coating is applied to a metal substrate.
- e. The hourly and ton per year VOC emission limitations represent the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation.
- f. This emissions unit is subject to 19.41 lbs VOC/hr from coating operations at all times except for when subject to OAC rule 3745-21-07(G)(2) as specified in section b)(2)g.
- g. This emissions unit becomes subject to OAC rule 3745-21-07(G)(2) for each day when any photochemically reactive material is applied to any non-metal substrate. On any such day, all emissions from both the application of photochemically reactive and non-photochemically reactive materials (coatings) on non-metal substrates is applicable to the requirement that OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.
- h. On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. However, the rule rescindment and new rule have 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 rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07 (G) (2) still exists as part of the federally-approved SIP of Ohio.
- i. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.
- j. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- k. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).
- l. The permittee shall operate the waterwash control system whenever this emissions unit is in operation.



- m. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- n. This facility is applicable to both the Surface Coating of Plastic Parts and Products MACT (40 CFR, Part 63, Subpart PPPP) and the Surface Coating of Miscellaneous Metal Parts and Products MACT (40 CFR, Part 63, Subpart MMMM). In accordance with the rule, the company chooses to have all applicable surface coating operations comply with the emissions limits set forth in Subpart PPPP since the coating of plastic parts is the predominant activity at the facility.
- o. The permittee has elected to use either the compliance option provided by 40 CFR 63.4491(a) [compliant material option] or 40 CFR 63.4491(b) [emission rate without add-on controls option]. This is accomplished by demonstrating that the organic HAP emissions rate for the coating operation is less than or equal to the applicable emission limit in 63.4490, calculated as a rolling 12-month emissions rate and determined on a monthly basis. The permittee must meet all of the requirements of 63.4540, 63.4541 and 63.4542 for the compliant material option, if this option is chosen, or 63.4550, 63.4551, and 63.4552 for the emission rate without add-on controls option, if this option is chosen, to demonstrate compliance with the emissions limit. The permittee is required to notify the Ohio EPA, Northwest District Office prior to the use of another compliance option as identified in 40 CFR 63.4491.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of coating employed in emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 240$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating employed

G_i = Gallons used of each coating for the rolling 12-month period

n = total number of unique coatings employed in emission units K001, K028 through K032, K034, K039, K040, K041, K043 and K044

Compliance with the annual restriction on the amount of coatings shall be based upon a rolling, 12-month summation.



[OAC rule 3745-77-07(A)(1) and PTI #03-17378]

- (2) The use of volatile organic compounds, as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.

[OAC rule 3745-77-07(A)(1) and PTI #03-17378]

- (3) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control system shall be employed during all periods of coating application to control particulate emissions.

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

- (4) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records that document whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (2) The permittee shall maintain monthly records of the following information for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044 combined:
 - a. the company name and identification for each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon, as applied;
 - d. the VOC emission rate, in pounds, for each coating employed [c)(2)b. x c)(2)c.];
 - e. the total VOC emission rate from all coatings employed [summation of c)(2)d.], in pounds or tons;
 - f. the rolling, 12-month VOC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (3) The permittee shall maintain monthly records of the following information for cleanup materials employed in each emissions unit:
 - a. the company name and identification for each cleanup material employed;



- b. the volume, in gallons, of each cleanup material employed;
- c. the OC content of each cleanup material employed, in pounds per gallon;
- d. the OC emission rate, in pounds, for each cleanup material employed [c)(3)b. x c)(3)c.]; and
- e. the total OC emissions rate from all cleanup materials employed [summation of c)(3)d.], in pounds or tons.

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (4) On any day when any photochemically reactive material is applied to any non-metal substrate, the permittee shall collect and record the following information for each emissions unit for such day:
 - a. The company name and identification for each coating employed on a non-metal substrate;
 - b. The number of gallons of each coating applied on a non-metal substrate;
 - c. The organic compound content of each coating, in pounds/gallon, as applied on any non-metal substrate;
 - d. The total organic compound emission rate for all coatings applied on a non-metal substrate, in pounds per day [c)(4)b. x c)(4)c.];
 - e. The total number of hours the emissions unit was involved in the operation of coating of non-metal substrates; and
 - f. The average hourly organic compound emission rate involving the operation of coating non-metal substrates [c)(4)d./c)(4)e.], in pounds per hour (average).

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (5) The permittee shall collect and record the following information when any coating is applied to a metal substrate in each emissions unit:
 - a. The company name and identification for each coating employed on a metal substrate; and
 - b. The VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, employed on any metal substrate. The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$.



[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (6) In conjunction with the monitoring and recordkeeping in c)(4) above, the permittee shall collect and record the following information each month for all cleanup materials employed in emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined:
 - a. the volume, in gallons, of each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds per gallon;
 - c. the OC emission rate, in pounds, for each cleanup material employed [c)(6)a. x c)(6)b.];
 - d. the total OC emissions rate from all cleanup materials employed [summation of c)(6)c.], in pounds or tons; and
 - e. the annual year-to-date OC emissions from all cleanup materials employed [sum of c)(6)d. for each calendar month to date from January to December].

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.

[OAC rule 3745-77-07(C)(1) and PTI #03-13378]

- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

- (8) The permittee shall conduct periodic inspections of the waterwash control system to determine whether it is operating in accordance with the manufacturer=s recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer=s recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

- (9) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control system while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.



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

- (10) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

- (11) The permittee shall maintain records that document any time periods when the waterwash control system was not in service when the emissions unit was in operation, as well as, a record of all operations during which the waterwash control system was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

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

- (12) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart PPPP (the predominant activity at the facility), including the following sections:

63.4530	Records that must be kept
63.4531	In what form and for how long records must be kept

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR, Part 63, Subpart PPPP]

e) Reporting Requirements

- (1) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01 and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the event occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- (2) The permittee shall notify the Northwest District Office in writing of any daily record showing that the VOC content exceeded the limitation of 3.5 pounds VOC per gallon minus water and exempt solvents that is applicable when applying a coating to a metal



substrate. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the 240 tons of VOC per rolling, 12-month period for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined;
 - b. Any exceedance of the monthly or annual cleanup material emissions limitations specified in Section b)(1)a. of this permit;
 - c. For the days during which a photochemically reactive material was applied to a non-metal substrate, an identification of each day during which the average hourly organic compound emissions as calculated by term and condition c)(4)f. exceeded 8 pounds per hour; and
 - d. For the days during which a photochemically reactive material was applied to a non-metal substrate, an identification of each day during which the average daily organic compound emissions as calculated by term and condition c)(4)d. exceeded 40 pounds per day.
 - e. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer=s recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- (4) 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 PPPP, per the following sections:

63.4510	Notifications that must be submitted
63.4520	Reports that must be submitted

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR, Part 63, Subpart PPPP]

f) Testing Requirements

- (1) Compliance with the emission limitations specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 19.41 lbs VOC/hr and 85.02 tons VOC/yr from coating operations from each emissions unit



Applicable Compliance Method: The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 3.0 gallon per hour and a maximum VOC content of 6.47 lbs/gallon.

The ton per year emission limitation was developed by multiplying the emission limitation of 19.41 lbs VOC/hr by a maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the allowable VOC emission limitations above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- b. Emission Limitation: 240 tons VOC/rolling, 12,-month period from coating operations for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section c)(2) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- c. Emission Limitation: 3.5 pounds VOC per gallon coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section c)(5) of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- d. Emission Limitation: 65.90 lbs OC/month from cleanup operations from each emissions unit

Applicable Compliance Method: Compliance shall be based on the recordkeeping in section c)(3) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- e. Emission Limitation: 8.19 tons OC/yr from cleanup operations for emissions units K001, K028 through K032, K034, K039, K040, K041, K043 and K044, combined

Applicable Compliance Method: Compliance shall be based on the recordkeeping in section c)(6) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]



- f. Emission Limitation: OC emissions shall not exceed 8 pounds per hour and 40 pounds per day from each emissions unit

Applicable Compliance Method: Compliance shall be based upon the recordkeeping requirements in section c)(4) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17378]

- g. Emission Limitation: For each existing general use coating affected source, limit organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period from each emissions unit

Applicable Compliance Method: The permittee shall demonstrate compliance with this limitation based upon the record keeping requirements specified in section d)(12) and the compliance requirements and test requirements specified in section f)(2) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR Part 63, Subpart PPPP]

- (2) The permittee shall comply with the applicable compliance requirements and test requirements as required under 40 CFR, 63 Subpart PPPP, including the following sections:

63.4500	General requirements for complying with this subpart
63.4540	Compliance Requirements for the Compliant Material Option – By what date must I conduct the initial compliance demonstration*
63.4541	Compliance Requirements for the Compliant Material Option – How do I demonstrate initial compliance with the emission limitations*
63.4542	Compliance Requirements for the Compliant Material Option – How do I demonstrate continuous compliance with the emission limitations*
63.4550	Compliance Requirements for the Emission Rate Without Add-On Controls – By what date must I conduct the initial compliance demonstration*
63.4551	Compliance Requirements for the Emission Rate Without Add-On Controls – How do I demonstrate initial compliance with the emission limitations*
63.4552	Compliance Requirements for the Emission Rate Without Add-On Controls – How do I demonstrate continuous compliance with the emission limitations*

*The permittee has elected to use either the compliance option provided by 40 CFR 63.4491(a) [compliant material option] or 40 CFR 63.4491(b) [emission rate without add-on controls option]. The permittee must meet all of the requirements of 63.4540, 63.4541 and 63.4542 for the compliant material option, if this option is chosen, or 63.4550, 63.4551, and 63.4552 for the emission rate without add-on controls option, if this option is chosen, to demonstrate compliance with the emissions limit [See b)(2)n.].

[OAC rule 3745-77-07(C)(1), PTI #03-17378 and 40 CFR, Part 63, Subpart PPPP]

- g) Miscellaneous Requirements

- (1) None.