State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

11/23/2009

Certified Mail

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

Jerry Hoback
Plastpro Inc-Ashtabula Plant
4737 Kister Court. Ashtabula Ohio 44004
Saybbook, OH 44004

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0204000441
Permit Number: P0105074
Permit Type: Initial Installation
County: Ashtabula

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

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

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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.ohio.gov.

Sincerely,

Michael W. Ahern

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

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

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Air Pollution Permit-to-Install
for
Plastpro Inc-Ashtabula Plant

Facility ID:	0204000441
Permit Number:	P0105074
Permit Type:	Initial Installation
Issued:	11/23/2009
Effective:	11/23/2009

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install
for
Plastpro Inc-Ashtabula Plant

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 7
9. Reporting Requirements 7
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 9
14. Public Disclosure 9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 9
16. Fees 9
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 14
1. R004 15

Authorization

Facility ID: 0204000441
Facility Description: Manufacture of Fiberglass Reinforced Plastics
Application Number(s): A0037594
Permit Number: P0105074
Permit Description: Installation of paint booth no. 2 for surface coating of plastic products with a paint filter to control particulate emissions (R004)
Permit Type: Initial Installation
Permit Fee: $200.00
Issue Date: 11/23/2009
Effective Date: 11/23/2009

This document constitutes issuance to:

Plastpro Inc-Ashtabula Plant
4737 Kister Court. Ashtabula Ohio 44004
Saybrook Twp., OH 44004

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

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0105074
Permit Description: Installation of paint booth no. 2 for surface coating of plastic products with a paint filter to control particulate emissions (R004)

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

Emissions Unit ID:	**R004**
Company Equipment ID:	R002
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

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. 2.a), Severability Clause

(2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements

(3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A. 9., Reporting Requirements

(5) Standard Term and Condition A. 10., Applicability

(6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A. 14., Public Disclosure

(8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A. 16., Fees

(10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

a) 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.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.

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, revoked, or revoked and reissued, for cause. 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 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.

4. 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, 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.

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, 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.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written 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. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. 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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.

c) 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 ORC section 3704.08.

(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.

d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

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 quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

18. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

19. 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.

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

   The final rules found in 40 CFR Part 63, Subpart PPPP establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for plastic parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of plastic parts and products:

   a) all coating operations as defined in 40 CFR 63.4581;

   b) all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

   c) all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

   d) all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

   The permittee shall be subject to this NESHAP upon the startup of the coating operations. The first day of operations shall begin the initial compliance period, which shall end on the last day of the 12th month following the compliance date, or the last day of the 12th month following the month including the compliance date, if startup operations do not begin on the first day of the month.

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

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

   Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the Director (Ohio EPA Division of Air Pollution Control Northeast District Office), which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan

or other standard operating procedures), operation and maintenance records, and inspection of the facility.

4. Monitoring and/or Record Keeping Requirements – Table 2 to Subpart PPPP of 40 CFR 63 – Applicability of General Provisions to Subpart PPPP of Part 63.

5. Reporting Requirements - The permittee shall submit an initial notification of compliance status report no later than 30 calendar days following the end of the initial compliance period (documented in B.2). The initial notification of compliance shall contain the following information:

   a) company name and address;

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

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

   d) identification of each coating operation using the "compliant material" option;

   e) a statement as to whether each coating met the emission limitation for the initial compliance period and if any thinner, additive, and/or cleanup material contained any organic HAP;

   f) if there was a deviation during the initial compliance period, a description of the deviation and statement of the cause and the calculations of emissions used to determine noncompliance with the applicable limits;

   g) calculations and/or supporting documentation (information from supplier or manufacturer or summary of testing results) for the following:

      (1) mass fraction of organic HAP for one representative coating, one thinner and/or additive, and one cleanup/purge material;

      (2) the mass fraction of coating solids for the representative coating;

      (3) the density for the representative coating; and

      (4) the calculation of the organic HAP content for the representative coating, for demonstration of compliance with the limitation, in kg (lb) organic HAP per kg (lb) of coating solids;

   h) if using the predominant activity alternative under 40 CFR 63.4490(c)(1), the data and calculations used to determine the predominant activity; and

   i) if using the "facility-specific emission limit" alternative under 40 CFR 63.4490(c)(2), the calculation of the "facility-specific" emission limitation.

6. Testing Requirements – Table 2 to Subpart PPPP of 40 CFR 63 – Applicability of General Provisions to Subpart PPPP of Part 63.

C. Emissions Unit Terms and Conditions

1. R004

Operations, Property and/or Equipment Description:

Paint spray booth no. 2 for coating of fiberglass reinforced plastic parts with a fiberglass filter to control particulate emissions

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) b)(2)b., b)(2)c., c)(1)a., c)(1)b., d)(1) through d)(5) and e)(1)a. for coating overspray control; and

(2) d)(8) for Toxic Air Contaminants requirements.

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(E) – voluntary restriction to avoid BAT	Particulate emissions (PE) shall not exceed 9.9 tons/year. See b)(2)a. and b)(2)e. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-17-11(C) and the requirements of 40 CFR Part 63, Subpart PPPP as well as the general provisions in 40 CFR Part 63, Subpart A as specified in Table 2 of Subpart PPPP.
b.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(E). See b)(2)a.
d.	OAC rule 3745-17-11(C)	See b)(2)b., b)(2)c., c)(1)a and c)(1)b.
e.	OAC rule 3745-21-07(G)(2)	Each day that a photochemically reactive material, as defined in OAC rule 3745-21-01(C), is employed, the organic compound (OC) emissions from all coating materials and any photochemically reactive cleanup/purge materials shall not exceed 8 lbs/hr and 40 lbs/day. See b)(2)d.
f.	40 CFR 63.4480 - 63.4581 (40 CFR Part 63, Subpart	In accordance with 40 CFR 63.4490(a)(1), the organic Hazardous Air Pollutant (HAP)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	PPPP)	emissions shall not exceed 0.16 lb/lb of coating solids used during each rolling, 12-month period for a general use coating operation. See b)(2)f. See B.2. and B.5.
g.	40 CFR 63.1- 63.15 (40 CFR Part 63, Subpart A)	Table 2 to Subpart PPPP of 40 CFR 63 – Applicability of General Provisions to Subpart PPPP of Part 63. See B.2. through B.6.

(2) Additional Terms and Conditions

a. Permit to Install (PTI) P0105074 for this emissions unit takes into account the use of a dry particulate filter, whenever this emissions unit is in operation, with a minimum control efficiency of 97% and a minimum capture efficiency of 99.8%, by weight for PE, as a voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

b. 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.

c. The permittee shall operate the dry particulate filter system, associated with an emissions unit, whenever the emissions unit is in operation.

d. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions, shall become void after U.S. EPA approves the rule revision: b(1)(e)., b)(2)d., d)(6)c., d)(6)e. d)(6)f., d)(6)g., e)(1)b., e)(1)c., f)(1)c. and f)(1)d.

e. After the revised OAC rule 3745-21-07 is added to the Ohio SIP, the OC emissions from all materials employed in this emissions unit shall not exceed 148 lbs/day and 9.9 tons/year.

f. The permittee, using the "compliant material" option, shall not apply any coating in the coating(s) operations with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic

HAP emissions rate shall be calculated as required in 40 CFR 63.4551 and 63.4552 for the compliance period.

c) Operational Restrictions

(1) 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.

a. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

b. 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.

d) Monitoring and/or Recordkeeping Requirements

Coating Overspray Filter Requirements

(1) 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 Ohio EPA Northeast District Office upon request.

(2) 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.

(3) 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.

(4) 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 Ohio EPA Northeast District Office upon request.

(5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were 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.

Materials Usage and Emissions Estimates Requirements

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

a. the company identification for each coating and cleanup/purge material employed;

b. the number of gallons of each coating and cleanup material/purge material employed;

c. an identification of each material as non-photochemically reactive or photochemically reactive;

d. the OC content of each coating and cleanup/purge material, in lbs/gal;

e. the OC emissions rate for all coatings and photochemically reactive cleanup/purge materials, in lbs/day;

f. the total number of hours the emissions unit was in operation;

g. the average, hourly OC emissions rate for all coatings and photochemically reactive cleanup/purge materials, i.e., (e)/(f), in pounds per hour (average); and

h. the total OC emissions rate for all coatings and all cleanup/purge materials, in lbs/day.

[Notes: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive" is based upon OAC rule 3745-21-01(C)(5).

After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, d)(6)c., d)(6)e. d)(6)f. and d)(6)g. shall be voided entirely.]

(7) The permittee shall collect and record the information, as required by the following rules, for each month for this emissions unit:

a. See 40 CFR Part 63, Subpart PPPP (see 40 CFR 63.4530); and

b. See 40 CFR Part 63, Subpart PPPP (see 40 CFR 63.4531).

Toxic Air Contaminant Requirements

(8) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year or is subject to a federal standard in 40 CFR Part 63. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following for this emissions unit:

a. 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;

b. each day during which the average hourly OC emissions rate exceeded 8 lbs/hr, and the actual, average hourly OC emissions rate;

c. each day during which the daily OC emissions rate exceeded 40 lbs/day, and the actual OC emissions rate;

d. each day during which the daily OC emissions rate exceeded 148 lbs/day, and the actual OC emissions rate; and

e. after the end of the initial compliance period (after the last day of the twelfth month after startup), information for a semi-annual compliance report, as required by 40 CFR 63.4520, except that the reporting period is a 3-month quarter period, as described in A. Standard Terms and Conditions of this permit.

[Note: After the revision to OAC rule 3745-21-07 is approved into the Ohio SIP, e)(1)b. and e)(1)c. shall be voided.]

f) Testing Requirements

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

a. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

The PE rate shall not exceed 9.9 tons/year.

Applicable Compliance Method:

Compliance may be demonstrated based on the following:

i. The maximum, uncontrolled PE rate may be estimated as follows:

PE_{UNCTRL} = Usage x D x S x (1 – TE).

where:

PE_{UNCTRL} = maximum, uncontrolled PE rate, which is estimated to be 3.09 lbs PE_{UNCTRL}/hr;

Usage = maximum coating usage, which is 1 gal/hr as specified in the application for PTI# P0105074;

D = density of coating, which can be 10.74 lbs/gal as specified in the application for PTI# P0105074;

S = solids content of coating, which can be 48.0078% (0.00480078), by weight, as specified in the MSDS for a primer coating; and

TE = transfer efficiency, lbs coating solids deposited/lbs solids sprayed, which may be 40% (0.40), as stated in a 7/06/09 T. J. Hebert & Associates letter on behalf of the applicant.

ii. The maximum, hourly PE rate may be estimated as follows:

PE = PE_{UNCTRL} x {[CapE x (1 – CE)] + (1 – CapE)}.

where:

PE = maximum, PE rate, which is estimated to be 0.0987 lb PE/hr;

CapE = capture efficiency of the paint overspray filters, which is 0.97 as specified in the application for PTI# P0105074; and

CE = control efficiency of the paint overspray filters, which is 0.998 as specified in the application for PTI# P0105074.

iii. The maximum, annual PE rate may be estimated as follows:

PE/year = PE x 8,760 hrs/yr x ton PE/2,000 lbs PE.

where:

PE/year = maximum annual PE rate, which is estimated to be 0.43 ton/yr;

PE = maximum, hourly PE rate, which may be 0.0987 lb PE/hr as estimated in (1)b.ii; and

8,760 = maximum hours of operation per year.

c. Emission Limitation:

The OC emissions shall not exceed 8 lbs/hr for each day that photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(6)g.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, f)(1)c. shall be voided entirely.]

d. Emission Limitation:

The OC emissions shall not exceed 40 lbs/day for each day that photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(6)e.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, f)(1)d. shall be voided entirely.]

e. Emission Limitation:

The OC emissions shall not exceed 148 lbs/day for each day that any materials are employed.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(6)h.

f. Emission Limitation:

The OC emissions shall not exceed 9.9 tons/year.

Applicable Compliance Method:

Compliance shall be demonstrated by the summation of the daily OC emissions for the calendar year, based upon the record keeping requirements specified in d)(6)h, divided by 2000 pounds/ton.

g. Emission Limitation:

The organic HAP emissions from general use coating operation(s) shall not exceed 0.16 lb/lb of coating solids used during each rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(7).

g) Miscellaneous Requirements

(1) According to 40 CFR 63.4492(a), for any coating operation(s) on which the compliant material option or the emission rate without add-on controls option is used, the permittee is not required to meet the operating limits in 40 CFR 63.4492(b) or (c).

(2) According to 40 CFR 63.4493(a), for any coating operation(s) on which the compliant material option or the emission rate without add-on controls option is used, the permittee is not required to meet the work practice standards in 40 CFR 63.4493(b) or (c).