State of Ohio Environmental Protection Agency

STREET ADDRESS:
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50 W. Town St., Suite 700
Columbus, Ohio 43215

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

12/3/2009

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Mr. Lee Frederick
Berenfield Containers, Inc.
PO BOX 350
MASON, OH 45040

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1483090257
Permit Number: P0100720
Permit Type: Renewal
County: Warren

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Western Star. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page http://www.epa.ohio.gov/dapc in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777.

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*
HCDOES; Indiana; Kentucky

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description:

   This federally enforceable permit-to-install and operate (FEPTIO) is for the following 5 coating lines with a combined VOC emission limitation: emissions units K001, Lid Coating Line; K002, Side Seam Spray Booth; K003, Rollcoater; K004, Steel Drum Coating; and, K005, Side Seam Spray Booth. The emissions units are located at Berenfield Containers, Inc. The facility is a manufacturer and coater of steel drums.

3. Facility Emissions and Attainment Status:

   Berenfield Containers, Inc is located in Warren County which is currently non-attainment for the 8-hour ozone standard, non-attainment for PM2.5 and attainment for all other criteria pollutants. The facility is currently a synthetic minor facility for hazardous air pollutants (HAPs) and volatile organic compounds (VOCs) first established in air permit to install (PTI) number 14-03933 issued 02/07/96 to avoid being subject to the following requirements: Title V and non-attainment review.

4. Source Emissions:

   With the renewal of this FEPTIO, VOC emissions will remain limited to 97.3 tons per year (TPY) as a combined limitation for emissions units K001-K005. HAP emissions will also remain limited to less than 10 TPY for a single HAP and less than 25 TPY for any combination of HAPs. In order to meet these limitations, the permit requires usage, VOC content limitations and daily and monthly records. Recordkeeping and reporting requirements will ensure compliance with these limitations.

5. Conclusion:

   With the federally enforceable limitations established in air PTI number 14-03933 and carried through with this FEPTIO for emissions unit K001-K005, the permittee will continue to be a synthetic minor facility for HAP and VOC emissions. The permittee will maintain records and submit reports to demonstrate compliance with the permit limitations.

6. Please provide additional notes or comments as necessary:

   None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
Individual HAP	9.9
Combined HAPs	24.9
VOC	97.3

Warren County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Berenfield Containers, Inc.

Issue Date: 12/3/2009
Permit Number: P0100720
Permit Type: Renewal
Permit Description: Interior and Exterior Steel Coating Lines that were first issued a synthetic minor permit under PTI 14-3933 issued 2/7/96. The five emission units have identical terms and conditions so were combined in an emission group.
Facility ID: 1483090257
Facility Location: Berenfield Containers, Inc.
1229-1234 CASTLE DR,
MASON, OH 45040
Facility Description: Other Metal Container Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Alberta Mellon at Hamilton County Dept. of Environmental Services, 250 William Howard Taft Pkwy. or (513)946-7777. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install and Operate
for
Berenfield Containers, Inc.

Facility ID: 1483090257
Permit Number: P0100720
Permit Type: Renewal
Issued: 12/3/2009
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 Permit-to-Install and Operate
for
Berenfield Containers, Inc.

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Authorization

Facility ID: 1483090257
Application Number(s): A0032461
Permit Number: P0100720
Permit Description: Interior and Exterior Steel Coating Lines that were first issued a synthetic minor permit under PTI 14-3933 issued 2/7/96. The five emission units have identical terms and conditions so were combined in an emission group.
Permit Type: Renewal
Permit Fee: $0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 12/3/2009
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Berenfield Containers, Inc.
1229-1234 CASTLE DR
MASON, OH 45040

of a Permit-to-Install and Operate 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:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0100720
Permit Description: Interior and Exterior Steel Coating Lines that were first issued a synthetic minor permit under PTI 14-3933 issued 2/7/96. The five emission units have identical terms and conditions so were combined in an emission group.

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

Group Name: Steel Coating Lines

Emissions Unit ID:	**K001**
Company Equipment ID:	Lid Coating Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Side Seam Spray Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	Rollcoater
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K004**
Company Equipment ID:	Steel Drum Coating
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K005**
Company Equipment ID:	Side Seam Spray Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. **What does this permit-to-install and operate ("PTIO") allow me to do?**

   This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. **Who is responsible for complying with this permit?**

   The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

   The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. **What records must I keep under this permit?**

   You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. **What are my permit fees and when do I pay them?**

   There are two fees associated with permitted air contaminant sources in Ohio:

   - PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

     You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

   - Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. **When does my PTIO expire, and when do I need to submit my renewal application?**

   This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Hamilton County Dept. of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) 2., 3., 4., and 5.

2. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001 (Lid Coating Line), K002 (Side Seam Spray Booth), K003 (Rollcoater), K004 (Steel Drum Coating), K005 Side Seam Spray Booth) any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units, or future constructed emissions units, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

3. The permittee shall collect and record the following information each month for emissions units identified in 2.:

   a) The name and identification number of each coating employed;

   b) The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

   c) The total combined HAP content of each coating and cleanup material in pounds of combined HAPs per gallon of coating as applied [sum all the individual HAP contents from b)];

   d) The number of gallons of each coating employed;

   e) The name and identification of each cleanup material employed;

   f) The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

   g) The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from f)];

   h) The number of gallons of each cleanup material employed;

   i) The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of b) times d) for each coating and stripping material plus the sum of f) times h) for each cleanup material];

   j) The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of c) times d) for each coating plus the sum of g) times h) for each cleanup material];

k) The updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

l) The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting Hamilton County Department of Environmental Services. This information does not have to be kept on an individual emissions unit basis.

4. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations outlined in 2. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).

5. Emission Limitation:

9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emissions units listed in 2.

Applicable Compliance Method:

Compliance with the HAP emission limitations in 2. shall be demonstrated by the record keeping requirements specified in 3.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Steel Coating Lines: K001, K002, K003, K004, K005,

EU ID	Operations, Property and/or Equipment Description
K001	Lid Coating Line
K002	Side Seam Spray Booth
K003	Rollcoater
K004	Steel Drum Coating
K005	Side Seam Spray Booth

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(2), d)(3), d)(4), d)(5), and d)(6).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., c)(3), d)(1)h., d)(1)i. and e)(1).

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)	Volatile Organic Compound (VOC) emissions shall not exceed 2795 pounds per day from employing interior coatings and 2672 pounds per day from employing exterior coatings, for emissions units K001 through K005, combined. VOC emissions shall not exceed 562.5 pounds per week from employing cleanup material for emissions units K001 through K005, combined. See b)(2)a through b)(2)c., c)(1) and c)(2). Compliance with OAC rule 3745-31-05(A)(3) also includes compliance with

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		OAC rule 3745-31-05(D), 3745-21-09(U)(1)e and 3745-21-09(U)(1)(f).
b.	OAC rule 3745-31-05(D) Synthetic Minor for HAPs and VOC to Avoid Title V	Volatile Organic Compound (VOC) emissions shall not exceed 25.6 tons per year (TPY) from employing interior coatings and 65.7 TPY from employing exterior coatings, for emissions units K001 through K005, combined based on a rolling, 12-month limitation. Volatile Organic Compound (VOC) emissions shall not exceed 6 TPY from employing cleanup materials for emissions units K001 through K005, combined based on a rolling, 12-month limitation. See b)(2)b.ii., c)(3)a. through c)(3)c. and B.2.
c.	OAC rule 3745-21-09(U)(1)(e)	See b)(2)b.i.
d.	OAC rule 3745-21-09(U)(1)(f)	The VOC content limitation outlined in this rule is less stringent than the VOC content limitation established under OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(C)	Exempt per OAC rule 3745-17-11(A)(1)(h) & (j).

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by VOC content limitations and compliance with material usage and emission limitations. In addition, emission units K001, K002, K004, and K005 shall employ airless, or air assisted airless spray guns.

b. The VOC contents of the coatings employed in emissions units K001 through K005 shall not exceed the following:

i. For the interior coating of a steel pail or drum, 4.3 pounds of VOC per gallon, excluding water and exempt solvents.

ii. For the exterior coating of a steel pail or drum, 3.34 pounds of VOC per gallon, excluding water and exempt solvents.

c. The VOC content of the cleanup materials employed in emissions units K001 through K005 shall not exceed 7.5 pounds of VOC per gallon.

c) Operational Restrictions

(1) Daily coating material usages shall not exceed the following:

a. For coatings used to coat the interior of a steel pail or drum – 650 gallons per day.

b. For coatings used to coat the exterior of a steel pail or drum – 800 gallons per day.

(2) Cleanup material usage shall not exceed 75 gallons per week.

(3) Annual coating material and cleanup material usages shall not exceed the following based upon a rolling 12-month summation:

a. For coatings used to coat the interior of a steel pail or drum, 11,896 gallons per year.

b. For coatings used to coat the exterior of a steel pail or drum, 39,340 gallons per year.

c. Cleanup material usage shall not exceed 1600 gallons per year.

d. The annual usage limitations may be exceeded provided the rolling, 12-month VOC emissions for each coating type is not exceeded.

The permittee has existing records to demonstrate compliance with these annual usage limitations.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records of the following information:

a. The company identification for each type of coating (interior and exterior) and cleanup material.

b. The number of gallons employed.

c. The VOC content, in pounds of VOC per gallon of coating.

d. The VOC content, in pounds of VOC per gallon of coating, minus water and exempt solvents.

e. The water content, in percent by volume.

f. The solids content, in percent by volume.

g. The daily VOC emissions for each type of coating (interior and exterior) and cleanup material.

h. The rolling, 12-month summation of coating (interior and exterior) and cleanup material usage, in gallons for each month.

i. The rolling, 12-month summation of VOC emissions, in pounds for coatings (interior and exterior) and cleanup materials.

(2) The PTIO application for emissions unit K001, K002, K003 and K005 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. The exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Pollutant: 0-cresol

TLV (ug/m3): 22,078

Maximum Hourly Emission Rate (lbs/hr): 4.72

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 489.9

MAGLC (ug/m3): 523.81

The permittee, having demonstrated that emissions of 0-cresol, from emissions unit(s) K001, K002, K004 and K005, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. Changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. Physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s)

modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. The Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. A copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. The documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

(6) For emissions unit K004, 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. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO 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 PTIO**.**

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

The rolling, 12-month summation of the material usage limitations outlined in c)(3) and the rolling, 12-month summation of the VOC emissions outlined in b)(1)b.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Emission Limitations:

Volatile Organic Compound (VOC) emissions shall not exceed 2795 pounds per day from employing interior coatings and 2672 pounds per day from employing exterior coatings, for emissions units K001 through K005, combined.

VOC emissions shall not exceed 562.5 pounds per week from employing cleanup material for emissions units K001 through K005, combined.

Applicable Compliance Method:

Compliance with the daily VOC emission limitations from interior and exterior coating materials shall be demonstrated by the recordkeeping requirements in d)(1)g.

(2) Usage Limitations:

For coatings used to coat the interior of a steel pail or drum, material usage shall not exceed 11,896 gallons per year based on a rolling, 12-month summation.

For coatings used to coat the exterior of a steel pail or drum, material usage shall not exceed 39,340 gallons per year based on a rolling, 12-month summation.

Cleanup material usage shall not exceed 1600 gallons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual material usage limitations shall be demonstrated by the recordkeeping requirements in d)(1)h.

(3) Emission Limitation:

For the interior coating of a steel pail or drum, 4.3 pounds of VOC per gallon, excluding water and exempt solvents.

For the exterior coating of a steel pail or drum, 3.34 pounds of VOC per gallon, excluding water and exempt solvents.

For cleanup material, 7.5 pounds VOC per gallon of cleanup material.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1). Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the inks and coatings.

g) Miscellaneous Requirements

(1) None.