State of Ohio Environmental Protection Agency

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

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

12/22/2009

Certified Mail

Facility ID: 0372030199
Permit Number: P0104513
County: Sandusky

Mr. Brad Shirk
Eaton Inoac Co
1410 Motor Drive
Fremont, OH 43420

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

Dear Permit Holder:

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

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

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

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, Northwest District Office

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

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

Eaton Inoac Co

Facility ID: 0372030199
Permit Number: P0104513
Permit Type: Renewal
Issued: 12/22/2009
Effective: 1/12/2010
Expiration: 1/12/2015

Title V Permit to Control Air Pollution
OAC Chapter 3745-77
Eaton Inoac Co

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Authorization

Facility ID: 0372030199
Facility Description: Coating of plastic parts.
Application Number(s): A0018682, A0035751
Permit Number: P0104513
Permit Description: Coating of plastic parts.
Permit Type: Renewal
Issue Date: 12/22/2009
Effective Date: 1/12/2010
Expiration Date: 1/12/2015
Superseded Permit Number:

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

Eaton Inoac Co
1410 Motor Drive
Fremont, OH 43420

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

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 contaminent 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.

B. Facility-Wide Terms and Conditions

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

   a) 4.

2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants, Surface Coating of Plastic Parts: K004, P021, and P801. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart PPPP. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart PPPP. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart PPPP, and Subpart A.

   All the requirements of 40 CFR Part 63, Subpart PPPP have been established in the Title V permit for this facility, which will encompass this emissions unit upon reissuance. The applicable sections of 40 CFR Part 63, Subpart PPPP have been cited in the appropriate sections for the non-insignificant emissions units (K004 and P801) subject to this rule. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

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

3. The following insignificant emissions unit 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 unit listed below is 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.

   Emissions unit B004 is also subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA)due to the June 8, 2007 D.C.Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

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

   a) B004 – 6.277 mmBtu/hr natural gas-fired boiler.

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

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

   b) P101 – blow mold machine #1 (formerly Z001);

   c) P102 – blow mold machine #2 (formerly Z002);

   d) P103 – blow mold machine #3 (formerly Z003;

   e) P104 – blow mold machine #4 (formerly Z004);

f) P105 – blow mold machine #5 (formerly Z005);

g) P106 – blow mold machine #6 (formerly Z006);

h) P109 – robotic sanding room #3 (formerly Z009);

i) P110 – robotic sanding room #4 (formerly Z010);

j) P111 – post-op rework operations for plastic parts (formerly Z011);

k) P112 – assembly and post op rework for plastic parts (formerly Z012);

l) P119 – paint line #4 air make-up unit – primer booth (formerly Z019);

m) P120 – paint line #4 air make-up unit – color booth (formerly Z020);

n) P121 – paint line #4 air make-up unit – clear booth (formerly Z021);

o) P143 – 2.24 mmBtu/hr propane vaporizer (formerly Z043);

p) P145 – 1.83 mmBtu/hr natural gas fired pellet dryer #1, for blow mold #5 & 6 (formerly Z045);

q) P147 – storage silo #1, for blow mold pelletized resin (formerly Z047);

r) P148 – storage silo #2, for blow mold pelletized resin (formerly Z048);

s) P149 – storage silo #3, for blow mold pelletized resin (formerly Z049);

t) P150 – storage silo #4, for blow mold pelletized resin (formerly Z050);

u) P151 – storage silo #5, for blow mold pelletized resin (formerly Z051);

v) P152 – storage silo #6, for blow mold pelletized resin (formerly Z052);

w) P153 – storage silo #7, for blow mold pelletized resin (formerly Z053);

x) P154 – storage silo #8, for blow mold pelletized resin (formerly Z054);

y) P155 – laser cutting operations (formerly Z055);

z) P156 – robotic sanding operations #1 for blow mold machines (formerly Z056);

aa) P157 – miscellaneous natural gas fired space heaters <4 mmBtu/hr (formerly Z057);

bb) P158 – blow mold electric dryer #1, for mold machines 1, 2, & 3 (formerly Z058);

cc) P160 – vacuum pump blow mold pellet delivery system (formerly Z060);

dd) P161 – blow mold electric dryer #2, for mold machine 4 (formerly Z061); and

ee) P163 – electric curing oven for paint supplier lab booth (formerly Z063).

C. Emissions Unit Terms and Conditions

1. K004, Paint Line #4

Operations, Property and/or Equipment Description:

Paint Line 4.

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 Emission 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 emission 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 Emission limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-13836, modification issued 03-07-2006)	117.0 lbs volatile organic compounds (VOC)/hr [See b)(2)b. and b)(2)f.] 6.10 lbs particulate emissions (PE)/hr and 14.5 tons PE/yr Visible PE shall not exceed 5% opacity, as a six-minute average See b)(2)c. and b)(2)d.
b.	OAC rule 3745-31-05(D)	277.8 tons VOC per rolling, 365-day period [See b)(2)b. and b)(2)e.]
c.	OAC rule 3745-21-07(G)(2)	See b)(2)m. and c)(1)
d.	OAC rule 3745-21-07(G)(1)	Organic compound (OC) emissions shall not exceed 3 pounds/hour and 15 pounds per day for each curing operation [see b)(2)b., b)(2)f., and b(2)m.]
e.	OAC rule 3745-17-07(A)	See b)(2)g. and b)(2)i.
f.	OAC rule 3745-17-10(B)	0.020 lb PE/mmBtu
g.	OAC rule 3745-17-11(B)	See b)(2)g. and b)(2)i.
h.	OAC rule 3745-17-11(C)	See b)(2)j., b)(2)k., c)(5), d)(6) thru d)(10), and e)(8)
i.	OAC rule 3745-18-06(A)	See b)(2)h.
j.	OAC rule 3745-21-08(B)	See b)(2)l.
k.	40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-4581) [In accordance with 40 CFR 63.4481(a) & (b) and 40 CFR 63.4482(a), (b), & (e), this emissions	The permittee shall comply with one of the four emissions limits identified in 40 CFR 63.4490(b)(1) through (4), or comply as provided in 40 CFR 63.4490(c). [In accordance with 40 CFR

	Applicable Rules/Requirements	Applicable Emission limitations/Control Measures
	unit is a plastic parts coating line subject to the emission limitations/control measures specified in Subpart PPPP.]	63.4490(c)(1), this emissions unit currently meets the applicability criteria of both the general use category and thermoplastic olefin (TPO) use category, and is complying with the emissions limit for the general use category which comprises 90% or more of the surface coating operations at the facility. For each existing general use coating affected source, the permittee is required to 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.] See b)(2)n. Compliance shall be demonstrated by following the applicable procedures in 63.4491 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule. See b)(2)o., b)(2)p., and b)(2)q.
l.	40 CFR Part 63.1-15 [40 CFR Part 63.4501]	Table 2 to Subpart PPPP of Part 63 – Applicability of General Provisions to Subpart PPPP of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. Paint Line #4 includes the following operations:

i. Paint mixing operation;

ii. Primer spray booth with water curtain;

iii. Indirect-fired primer curing oven;

iv. Color spray booth with water curtain;

v. Clearcoat spray booth with water curtain; and

vi. Indirect-fired clearcoat curing oven.

b. The volatile organic compound limitations represent VOC emissions as defined in OAC rule 3745-21-01(B)(14). The organic compound (OC) limitations for curing

operations established by OAC rule 3745-21-07(G)(1) represent emissions of OC as defined in OAC rule 3745-21-01(B)(10). The OC emissions from curing operations are considered VOCs for this emissions unit [See b)(2)f].

c. The requirements of this rule also include compliance with the requirements of OAC rules: 3745-31-05(D), 3745-21-07(G)(1), and 3745-17-10(B).

d. All particulate emissions (PE) are assumed to be particulate matter less than 10 microns in size (PM_{10}).

e. Eaton Inoac has requested a federally enforceable emission limitation for Paint Line #4 of 277.8 tons VOC per rolling, 365-day period for purposes of avoiding Prevention of Significant Deterioration (PSD) applicability. Paint Line #4 is an existing operation and, as such, has existing records of VOC emissions in lieu of establishing monthly VOC emissions restrictions for the first year of operation.

f. The VOC/OC emission limitations are applied as follows:

   i. The VOC limitation of 117.0 pounds/hr is established for all VOCs emitted from paint line #4 [See b)(2)a] and includes emissions from curing operations.

   ii. Each curing operation is also applicable to the requirement under OAC rule 3745-21-07(G)(1) that OC emissions do not exceed 3 lbs/hr and 15 lbs/day [See b)(2)b].

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

h. The emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A).

i. 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.

j. 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) fo OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

k. The permittee shall operate the waterwash control system whenever this emissions unit is in operation.

l. The permittee has satisfied the “latest available control techniques and operating practices” required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install #03-13836.

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

m. 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)c, b)(1)d, b)(2)(f)(ii), c)(1), d)(1), e)(1), and f)(1)(a)

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S.EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S.EPA approves the rule revision:

None.

n. The options for compliance when using more than one type of coating are described in 40 CFR 63.4490(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a facility specific emissions limit. The permittee is required to maintain documentation as required by 63.4530(c), and submit reports demonstrating compliance, as required in 63.4520.

o. The permittee has elected to use the compliance option provided by 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 63.4550, 63.4551, and 63.4552 to demonstrate compliance with the emissions limit using this option.

p. The permittee may use any of the three compliance options described in 63.4491(a), (b), or (c), however the permittee must meet all of the requirements of each option when it is used. The permittee is required to notify the Ohio EPA, Northwest District Office prior to the use of the compliance option described in 63.4491(c), since this option requires emissions testing to confirm the organic HAP emission reduction efficiency of the capture and control system.

Also, if the permittee switches compliance options for this coating operation, the permittee must document this as required by 63.4530(c), and report it in the next

semi-annual compliance report required in 63.4520. Nothing in this permit is intended to prevent the facility from switching between any compliance options provided under 40 CFR 63, Subpart PPPP, as expeditiously as allowed under that rule. [See 40 CFR 63.4480-4581.]

q. The permittee shall include all coatings, thinners, and/or other additives, and cleaning materials (as defined in 63.4581), used in the coating operation when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 63.4490.

c) Operational Restrictions

(1) The use of photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), in the paint booths and cleanup operation associated with this emissions unit is prohibited.

[OAC rule 3745-77-07(A)(1) and PTI #03-13836]

(2) The permittee shall burn only natural gas in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI #03-13836]

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

Subpart PPPP section	**Subpart PPPP requirement**
63.4492(a)	For any coating operation on which the "compliant materials" option or the "emissions rate without add-on controls" option is used, the permittee is not required to meet any operating limits.
63.4493(a)	For any coating operation on which the "complaint materials" option or the "emissions rate without add-on controls" option is used, the permittee is not required to meet any work practice standards.

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

(4) If the permittee elects to change the current compliance option identified in b)(2)o., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate operating and work practice requirements for the selected option. Specifically, use of the "emissions rate with add-on controls" option in 40 CFR 63.4491(c), requires the permittee to meet the operating requirements in 40 CFR 63.4492(b) and/or (c), and the work practice standards in 40 CFR 63.4493(b) and/or (c). See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

(5) 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 shall be employed during all periods of coating application to control particulate emissions.

[OAC rule 3745-77-07(A)(1) and PTI #03-13836]

(6) 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) and PTI #03-13836]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with condition c)(1), the permittee shall maintain records of the following information for this emissions unit:

a. The company identification for each liquid organic material employed in the paint booths and cleanup operation associated with this emissions unit; and

b. Documentation on whether or not each liquid organic material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(2) The permittee shall develop an information management system for this emissions unit which is capable of processing the appropriate input data in order to generate the following required records each day from coating operations for the entire line (cleanup operations associated with the coating operations are permitted under emissions unit P801):

a. Average pounds VOC/hour from coating operations for the entire line (total daily VOC emissions divided by total hours of coating operation);

b. Tons VOC/rolling, 365-day period from coating operations for the entire line;

c. Average pounds PE/hour from coating operations for the entire line (total daily PE emissions divided by total hours of coating operation);

d. Annual, year to date particulate emissions rate, in tons, from coating operations for the entire line [summation of the total daily PE in d)(2)c. for each calendar day to date from January to December].

e. Pounds OC/day* from each curing operation (oven) associated with the coating line; and

f. Average pounds OC/hour* from each curing operation (oven) associated with the coating line (total daily curing emissions for each oven divided by the total hours of curing operation).

*For purposes of calculating the OC emissions rates for curing operations as required in d)(2)e. and d)(2)f. above, the permittee shall utilize a value of 99.25 percent as the maximum percentage of OCs employed in each coating operation that is emitted uncontrolled from each coating operation. The remaining 0.75 percent of the OCs employed in each coating operation shall be considered to be the uncontrolled emissions for each coating operation's associated curing (oven). This "split" of OC emissions between the coating operations and their curing operations (ovens) was based upon emissions testing conducted by the permittee. The "split" of VOC emissions between the coating operations and their associated curing operations (ovens) shall be revised in accordance with the results of any future testing (weight%).

The OC emissions for curing operations regulated under OAC rule 3745-21-07(G)(1) represent emissions of OC as defined in OAC rule 3745-21-01. The OC emissions from curing operations are considered VOCs for this emissions unit.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

The information management system must be reviewed and approved by the Director (the appropriate Ohio EPA District Office of local air agency) prior to implementation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(4) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart PPPP, including the following sections:

Subpart PPPP section	**Subpart PPPP requirement**
63.4530(a)	Requirement to keep a copy of each notification and report, along with supporting documentation; requirement to keep records of the data and calculations used to determine the predominant activity.
63.4530(b)	Requirement to keep a current copy of materials suppliers or manufacturers information, such as formulation or test data.
63.4530(c)(1) and (c)(3)	For each compliance period: Requirement to keep a record of the coating operations on which you used

	each compliance option and the time periods (beginning and ending dates and times) for each option used, for each compliance period. For the "emissions rate without add-on controls" compliance option, requirement to keep a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month; the calculation of the total mass of coating solids used each month; and the calculation of each 12-month organic HAP emissions rate.
63.4530(d)	Requirement to keep a record of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period.
63.4530(e)	Requirement to keep a record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
63.4530(f)	Requirement to keep a record of the mass fraction of coating solids for each coating used during each compliance period.
63.4530(g)	Recordkeeping requirement that applies if the company uses an allowance for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF).
63.4530(h)	Requirement to keep records of the date, time, and duration of each deviation.
63.4531(a)	Requirements to keep records in a form suitable and readily available for expeditious review.
63.4531(b)	Requirement to keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
63.4531(c)	Requirement to keep each record on-site for 2 years following the date of each

	occurrence, measurement, maintenance, corrective action, report, or record.
63.4550	Timeline for conducting the initial compliance demonstration when using the "emissions rate without add-on controls" compliance option.
63.4551	Calculations for conducting initial compliance demonstrations when using the "emissions rate without add-on controls" compliance option.
63.4552	Methodology for demonstrating continuous compliance with the emission limitations when using the "emissions rate without add-on controls" compliance option.

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

(5) If the permittee elects to change the current compliance option identified in b)(2)o., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate monitoring and recordkeeping requirements for the selected option. Specifically, use of the "compliant materials" option requires compliance with the recordkeeping requirements in 63.4530(c)(2), and 63.4540, 63.4541, and 63.4542. Use of the "emissions rate with add-on controls" option requires compliance with the recordkeeping requirements in 63.4530(c)(4), and 63.4560, 63.4561, 63.4563, 63.4564, 63.4565, 63.4566, 63.4567, and 63.4568. See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

(6) 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) and PTI #03-13836]

(7) The permittee shall conduct periodic inspections of the waterwash control 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) and PTI #03-13836]

(8) 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 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) and PTI #03-13836]

(9) 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) and PTI #03-13836]

(10) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the waterwash control 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) and PTI #03-13836]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of a photochemically reactive material. 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 after the exceedance occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(2) The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, which identify each day during which the average hourly emissions exceeded any of the following:

a. 117.00 pounds VOC/hour;

b. 6.10 pounds PE/hour.

The permittee shall include in the report the actual average hourly emissions for each such day.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(3) The permittee shall submit annual reports that identify the total particulate emissions from coating operations for the entire line, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(4) The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, which identify any exceedances of the annual VOC emission limitation of 277.8 tons VOC per rolling, 365-day period.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(6) 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:

Subpart PPPP section	**Subpart PPPP requirement**
63.4510(a)	General – submit notifications in 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the permittee by the dates specified in those sections, except as provided in 63.4510(b).
63.4510(b)	Initial notification – for an existing affected source, you must submit the initial notification no later than 1 year after April 19, 2004; for a new or reconstructed affected source you must submit the initial notification required by 63.9(b) no later than 120 days after initial startup or 120 days after April 19, 2004, whichever is later.
63.4510(c)	Notification of compliance status – the permittee shall submit the notification of compliance status required by 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 63.4540, 63.4550, or 63.4560 that applies to your affected source, and

	shall include the information specified in paragraphs (c)(1) through (c)(11), and in 63.9(h).
63.4520(a)	Semiannual compliance reports – the permittee must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (a)(7) of this section.

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

(7) If the permittee elects to change the current compliance option identified in b)(2)o., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate reporting requirements for the selected option. Specifically, use of the "emissions rate with add-on controls" option in 40 CFR 63.4491(c), requires the permittee to meet the reporting requirements in 40 CFR 63.4520(b) and (c). See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

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

a. 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(s) was/were 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 #03-13836]

f) Testing Requirements

(1) Compliance with the emission limitations specified in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:

Organic compound (OC) emissions shall not exceed 3 pounds/hour and 15 pounds per day for each curing operation

<u>Applicable Compliance Method</u>:

The record keeping requirements specified in Section d)(2) of this permit shall be used to determine compliance with the hourly and daily OC emission limitations.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

b. Emission Limitation:

6.10 lbs PE/hr and 14.5 tons PE/yr

Applicable Compliance Method:

The record keeping requirements specified in Section d)(2) of this permit shall be used to determine compliance with the hourly and annual PE emission limitations.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with 40 CFR Part 60 Appendix A, Methods 1-5.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

c. Emission Limitation:

Visible PE shall not exceed 5% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR, Part 60.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

d. Emission Limitation:

117.00 lbs VOC/hr and 277.8 tons VOC per rolling, 365-day period

Applicable Compliance Method:

The record keeping requirements specified in Section d)(2) of this permit shall be used to determine compliance with the hourly and annual VOC emission limitations.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

e. Emission Limitation:

0.020 lb PE/mmBtu

Applicable Compliance Method:

The permittee may demonstrate compliance with this emission limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum heat input capacity of the emissions unit (mmBtu/hr).

If required, compliance with this emission limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03 (B)(9).

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

f. Emission Limitation:

The permittee shall comply with one of the four emissions limits identified in 40 CFR 63.4490(b)(1) through (4), or comply as provided in 40 CFR 63.4490(c). In accordance with 40 CFR 63.4490(c)(1), this emissions unit currently meets the applicability criteria of both the general use category and thermoplastic olefin (TPO) use category, and is complying with the emissions limit for the general use category which comprises 90% or more of the surface coating operations at the facility. For each existing general use coating affected source, the permittee is required to 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 record keeping requirements specified in Section d)(4) of this permit shall be used to determine compliance with the HAP emissions limit, for this affected source using the "emission rate without add-on controls" option found in 40 CFR 63.4491(b).

If the permittee elects to change the current compliance option identified in b)(2)o., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate testing/compliance demonstration requirements for the selected option. See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

(2) Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings employed in this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

g) Miscellaneous Requirements

(1) If the permittee chooses to use an add-on control device other than those listed in Table 1 to 40 CFR Part 63, Subpart PPPP, or chooses to monitor an alternative parameter and comply with a different operating limit, the permittee must apply to the Administrator of the USEPA for approval of the alternative monitoring under 63.8(f). See 40 CFR 63.4492(c).

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

2. K005, Paint Engineering Lab

Operations, Property and/or Equipment Description:

Paint engineering lab with dry filtration.

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 Emission 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 emission 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 Emission limitations/Control Measures
a.	OAC rule 3745-31-05 (A)(3) (PTI #03-13836, modification issued 03-07-2006)	23.52 lbs volatile organic compounds (VOC)/day 0.04 lb particulate emissions (PE)/hr and 0.1 ton PE/yr Visible PE shall not exceed 5% opacity, as a six-minute average See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-31-05(D)	3.1 tons VOC per rolling, 365-day period See b)(2)c. and b)(2)d.
c.	OAC rule 3745-21-07(G)	See b)(2)j. and c)(1)
d.	OAC rule 3745-17-11(B)	See b)(2)e. and b)(2)g.
e.	OAC rule 3745-17-07(A)	See b)(2)f. and b)(2)g.
f.	OAC rule 3745-17-11(C)	See b)(2)h., b)(2)i., c)(5), c)(6), d)(5), d)(6), d)(7), d)(8), d)(9), and e)(7)

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D).

b. All particulate emissions (PE) are assumed to be particulate matter less than 10 microns in size (PM_{10}).

c. The volatile organic compound limitations represent VOC emissions as defined in OAC rule 3745-21-01 (B)(14).

d. Eaton Inoac has requested a federally enforceable emission limitation for the paint blending operation of 3.1 tons VOC per rolling, 365-day period for purposes of avoiding Prevention of Significant Deterioration (PSD) applicability.

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

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

g. 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.

h. 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.

i. The permittee shall operate the dry particulate filter system whenever this emissions unit is in operation.

j. 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)c, c)(1), d)(1), and e)(1)

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S.EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S.EPA approves the rule revision:

None

c) Operational Restrictions

(1) The use of photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited.

[OAC rule 3745-77-07(A)(1) and PTI #03-13836]

(2) Annual VOC emissions from this emissions unit shall not exceed 3.1 tons based upon a rolling, 365-day summation of the daily VOC emission rates. Compliance with the annual VOC emission limitation of 3.1 tons shall be based upon a rolling, 365-day summation of the daily VOC emission rates.

[OAC rule 3745-77-07(A)(1) and PTI #03-13836]

(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) and PTI #03-13836]

(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) and PTI #03-13836]

d) Monitoring and/or Recordkeeping Requirements

(1) In order to demonstrate compliance with condition c)(1), the permittee shall maintain records of the following information for this emissions unit:

a. The company identification for each liquid organic material employed in the paint booths and cleanup operation associated with this emissions unit; and

b. Documentation on whether or not each liquid organic material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(2) The permittee shall develop an information management system for this emissions unit which is capable of processing the appropriate input data in order to generate the following required records each day from coating operations for the entire line:

a. pounds VOC/day;

b. tons VOC/rolling, 365-day period;

c. average pounds PE/hour (total daily PE emissions divided by total hours of operation);

d. annual, year to date particulate emission rate, in tons (summation of the total daily PE in "c" for each calendar day to date from January to December).

The information management system must be reviewed and approved by the Director (the appropriate Ohio EPA District Office or local air agency) prior to implementation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(3) 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) and PTI #03-13836]

(4) 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) and PTI #03-13836]

(5) 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 with any modifications deemed necessary by the permittee.

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

(6) 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) and PTI #03-13836]

(7) 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.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of a photochemically reactive material. 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 after the exceedance occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(2) The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, which identify any exceedances of the following emission limitations:

a. 23.52 pounds VOC/day;

b. 0.04 pounds PE/hour

The permittee shall include in the report the actual emissions and hours of operation for each such day/hour.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(3) The permittee shall submit annual reports that identify the total particulate emissions, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(4) The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, which identify any exceedances of the annual VOC emission limitation of 3.1 tons VOC per rolling, 365-day period.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

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

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(s) was/were 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 #03-13836]

f) Testing Requirements

(1) Compliance with the emission limitations specified in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

23.52 lbs VOC/day and 3.1 tons VOC per rolling, 365-day period

Applicable Compliance Method:

The record keeping requirements specified in Section d)(2) of this permit shall be used to determine compliance with the daily and annual VOC emission limitations.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

b. Emission Limitation:

0.04 lb PE/hr and 0.1 ton PE/yr

Applicable Compliance Method:

The record keeping requirements specified in Section d)(2) of this permit shall be used to determine compliance with the hourly and annual PE emission limitations.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with 40 CFR Part 60 Appendix A, Methods 1-5.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

c. Emission Limitation:

Visible PE shall not exceed 5% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR, Part 60.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

g) Miscellaneous Requirements

(1) None.

3. P801, Paint Line #4 - Paint Clean-Up Operations

Operations, Property and/or Equipment Description:

facility wide cleanup operations.

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 Emission 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 emission 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 Emission limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI #03-17033, issued 12-22-2005)	44.00 tons organic compounds (OC) per rolling, 12-month period See b)(2)a. and b)(2)b.
b.	OAC rule 3745-21-07(G)(2)	See b)(2)c. and c)(1)
c.	40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-4581) [In accordance with 40 CFR 63.4481(a) & (b) and 40 CFR 63.4482(a), (b), & (e), this emissions unit is a cleanup operation for a plastic parts coating line subject to the emission limitations/control measures specified in Subpart PPPP.]	The permittee shall comply with one of the four emissions limits identified in 40 CFR 63.4490(b)(1) through (4), or comply as provided in 40 CFR 63.4490(c). [In accordance with 40 CFR 63.4490(c)(1), this emissions unit currently meets the applicability criteria of both the general use category and thermoplastic olefin (TPO) use category, and is complying with the emissions limit for the general use category which comprises 90% or more of the surface coating operations at the facility. For each existing general use coating affected source, the permittee is required to 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.] See b)(2)d. Compliance shall be demonstrated by

	Applicable Rules/Requirements	Applicable Emission limitations/Control Measures
		following the applicable procedures in 63.4491 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule. See b)(2)e., b)(2)f., and b)(2)g.
d.	40 CFR Part 63.1-15 [40 CFR Part 63.4501]	Table 2 to Subpart PPPP of Part 63 – Applicability of General Provisions to Subpart PPPP of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. For cleanup operations, the permittee employs either a solvent consisting of 100% acetone or a reclaimed solvent consisting almost entirely of acetone. The reclaimed solvent is acetone which has been used to flush out equipment used for the application of coatings (i.e. lines, guns, etc.). During the flushing of coating application equipment the cleaning solvent becomes contaminated with volatile organic compounds (VOC) contained in the coating material. The VOC content of the reclaimed solvent is less than or equal to 5 percent, by volume and the VOC emissions have already been accounted for during the coating operations, therefore it is not necessary to establish a VOC emission limitation for cleanup operations.

b. The emission limitation for cleanup operations reflects organic compounds which do not participate in atmospheric photochemical reactions [see Section c)(2)] and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

c. 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)b, c)(1), d)(1), and e)(1)

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S.EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S.EPA approves the rule revision:

None

d. The options for compliance when using more than one type of coating are described in 40 CFR 63.4490(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a facility specific emissions limit. The permittee is required to maintain documentation as required by 63.4530(c), and submit reports demonstrating compliance, as required in 63.4520.

e. The permittee has elected to use the compliance option provided by 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 63.4550, 63.4551, and 63.4552 to demonstrate compliance with the emissions limit using this option.

f. The permittee may use any of the three compliance options described in 63.4491(a), (b), or (c), however the permittee must meet all of the requirements of each option when it is used. The permittee is required to notify the Ohio EPA, Northwest District Office prior to the use of the compliance option described in 63.4491(c), since this option requires emissions testing to confirm the organic HAP emission reduction efficiency of the capture and control system.

Also, if the permittee switches compliance options for this coating operation, the permittee must document this as required by 63.4530(c), and report it in the next semi-annual compliance report required in 63.4520. Nothing in this permit is intended to prevent the facility from switching between any compliance options provided under 40 CFR 63, Subpart PPPP, as expeditiously as allowed under that rule. [See 40 CFR 63.4480-4581.]

g. The permittee shall include all coatings, thinners, and/or other additives, and cleaning materials (as defined in 63.4581), used in the coating operation when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 63.4490.

c) Operational Restrictions

(1) The use of photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), for cleanup operations is prohibited.

[OAC rule 3745-77-07(A)(1) and PTI #03-17033]

(2) Except as provided for in Section b)(2)a., the use of volatile organic compounds, as defined in OAC rule 3745-21-01 (B)(6) and 40 CFR 51.100(s), for cleanup operations is prohibited.

[OAC rule 3745-77-07(A)(1) and PTI #03-17033]

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

Subpart PPPP section	Subpart PPPP requirement
63.4492(a)	For any coating operation on which the "compliant materials" option or the "emissions rate without add-on controls" option is used, the permittee is not required to meet any operating limits.
63.4493(a)	For any coating operation on which the "complaint materials" option or the "emissions rate without add-on controls" option is used, the permittee is not required to meet any work practice standards.

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

(4) If the permittee elects to change the current compliance option identified in b)(2)e., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate operating and work practice requirements for the selected option. Specifically, use of the "emissions rate with add-on controls" option in 40 CFR 63.4491(c), requires the permittee to meet the operating requirements in 40 CFR 63.4492(b) and/or (c), and the work practice standards in 40 CFR 63.4493(b) and/or (c). See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall develop an information management system for this emissions unit which is capable of processing the appropriate input data in order to generate the following required records:

a. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

b. documentation of whether or not each cleanup material employed, except as provided for in Section b)(2)a, is a volatile organic compound, as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s);

c. tons OC/month; and

d. tons OC per rolling, 12-month period.

The information management system must be reviewed and approved by the Director (the appropriate Ohio EPA District Office or local air agency) prior to implementation.

[OAC rule 3745-77-07(C)(1) and PTI #03-17033]

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

Subpart PPPP section	Subpart PPPP requirement
63.4530(a)	Requirement to keep a copy of each notification and report, along with supporting documentation; requirement to keep records of the data and calculations used to determine the predominant activity.
63.4530(b)	Requirement to keep a current copy of materials suppliers or manufacturers information, such as formulation or test data.
63.4530(c)(1) and (c)(3)	For each compliance period: Requirement to keep a record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option used, for each compliance period. For the "emissions rate without add-on controls" compliance option, requirement to keep a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month; the calculation of the total mass of coating solids used each month; and the calculation of each 12-month organic HAP emissions rate.
63.4530(d)	Requirement to keep a record of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period.
63.4530(e)	Requirement to keep a record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
63.4530(f)	Requirement to keep a record of the mass fraction of coating solids for each coating used during each compliance period.
63.4530(g)	Recordkeeping requirement that applies if the company uses an allowance for organic HAP contained in waste materials

	sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF).
63.4530(h)	Requirement to keep records of the date, time, and duration of each deviation.
63.4531(a)	Requirements to keep records in a form suitable and readily available for expeditious review.
63.4531(b)	Requirement to keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
63.4531(c)	Requirement to keep each record on-site for 2 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
63.4550	Timeline for conducting the initial compliance demonstration when using the "emissions rate without add-on controls" compliance option.
63.4551	Calculations for conducting initial compliance demonstrations when using the "emissions rate without add-on controls" compliance option.
63.4552	Methodology for demonstrating continuous compliance with the emission limitations when using the "emissions rate without add-on controls" compliance option.

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

(3) If the permittee elects to change the current compliance option identified in b)(2)e., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate monitoring and recordkeeping requirements for the selected option. Specifically, use of the "compliant materials" option requires compliance with the recordkeeping requirements in 63.4530(c)(2), and 63.4540, 63.4541, and 63.4542. Use of the "emissions rate with add-on controls" option requires compliance with the recordkeeping requirements in 63.4530(c)(4), and 63.4560, 63.4561, 63.4563, 63.4564, 63.4565, 63.4566, 63.4567, and 63.4568. See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

e) Reporting Requirements

(1) The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a photochemically reactive material, as defined in OAC rule 3745-21-01, for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #03-17033]

(2) Except as provided for in Section b)(2)a., the permittee shall notify the Director (the Ohio EPA 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 Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1) and PTI #03-17033]

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

Subpart PPPP section	**Subpart PPPP requirement**
63.4510(a)	General – submit notifications in 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the permittee by the dates specified in those sections, except as provided in 63.4510(b).
63.4510(b)	Initial notification – for an existing affected source, you must submit the initial notification no later than 1 year after April 19, 2004; for a new or reconstructed affected source you must submit the initial notification required by 63.9(b) no later than 120 days after initial startup or 120 days after April 19, 2004, whichever is later.
63.4510(c)	Notification of compliance status – the permittee shall submit the notification of compliance status required by 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 63.4540, 63.4550, or 63.4560 that applies to your affected source, and shall include the information specified in paragraphs (c)(1) through (c)(11), and in 63.9(h).

63.4520(a)	Semiannual compliance reports – the permittee must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (a)(7) of this section.

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

(4) If the permittee elects to change the current compliance option identified in b)(2)e., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate reporting requirements for the selected option. Specifically, use of the "emissions rate with add-on controls" option in 40 CFR 63.4491(c), requires the permittee to meet the reporting requirements in 40 CFR 63.4520(b) and (c). See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

44.00 tons OC per rolling, 12-month period

Applicable Compliance Method:

This emission limitation was established based on existing, maximum cleanup usage records over a 12-month period and incorporates a reduction of emissions due to the reclamation of recovered solvents.

The permittee shall demonstrate compliance with this emission limitation in accordance with the record keeping requirements specified in Section d)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-17033]

b. Emission Limitation:

The permittee shall comply with one of the four emissions limits identified in 40 CFR 63.4490(b)(1) through (4), or comply as provided in 40 CFR 63.4490(c). In accordance with 40 CFR 63.4490(c)(1), this emissions unit currently meets the applicability criteria of both the general use category and thermoplastic olefin (TPO) use category, and is complying with the emissions limit for the general use category which comprises 90% or more of the surface coating operations at the facility. For each existing general use coating affected source, the permittee is required to 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 record keeping requirements specified in Section d)(4) of this permit shall be used to determine compliance with the HAP emissions limit, for this affected source using the "emission rate without add-on controls" option found in 40 CFR 63.4491(b).

If the permittee elects to change the current compliance option identified in b)(2)o., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate testing/compliance demonstration requirements for the selected option. See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

g) Miscellaneous Requirements

(1) If the permittee chooses to use an add-on control device other than those listed in Table 1 to 40 CFR Part 63, Subpart PPPP, or chooses to monitor an alternative parameter and comply with a different operating limit, the permittee must apply to the Administrator of the USEPA for approval of the alternative monitoring under 63.8(f). See 40 CFR 63.4492(c).

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

4. P021, Paint Blending Operations

Operations, Property and/or Equipment Description:

Paint blending operations

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 #03-13836, issued 03-07-2006)	82.80 lbs volatile organic compounds (VOC)/day See b)(2)a. and b)(2)b.
	OAC rule 3745-31-05(D)	5.0 tons VOC per rolling, 365-day period See b)(2)a. and b)(2)c.
b.	OAC rule 3745-21-07(G)	See b)(2)d.
c.	40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-4581) [In accordance with 40 CFR 63.4481(a) & (b) and 40 CFR 63.4482(a), (b), & (e), this emissions unit is a paint blending operation for a plastic parts coating line subject to the emission limitations/control measures specified in Subpart PPPP.]	The permittee shall comply with one of the four emissions limits identified in 40 CFR 63.4490(b)(1) through (4), or comply as provided in 40 CFR 63.4490(c). [In accordance with 40 CFR 63.4490(c)(1), this emissions unit currently meets the applicability criteria of both the general use category and thermoplastic olefin (TPO) use category, and is complying with the emissions limit for the general use category which comprises 90% or more of the surface coating operations at the facility. For each existing general use coating affected source, the permittee is required to 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 Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)d. Compliance shall be demonstrated by following the applicable procedures in 63.4491 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule. See b)(2)e., b)(2)f., and b)(2)g.
d.	40 CFR Part 63.1-15 [40 CFR Part 63.4501]	Table 2 to Subpart PPPP of Part 63 – Applicability of General Provisions to Subpart PPPP of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The volatile organic compound limitations represent VOC emissions as defined in OAC rule 3745-21-01(B)(6).

b. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D).

c. Eaton Inoac has requested a federally enforceable emission limitation for the Paint Blending operation of 5.0 tons VOC per rolling, 365-day period for purposes of avoiding Prevention of Significant Deterioration (PSD) applicability. Paint Blending is an existing operation and, as such, has existing records of VOC emissions in lieu of establishing monthly VOC emission restrictions for the first year of operation.

d. OAC rule 3745-21-07(G) is not applicable to this emissions unit because the emissions unit does not employ, apply, evaporate, or dry any liquid organic material.

e. The options for compliance when using more than one type of coating are described in 40 CFR 63.4490(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a facility specific emissions limit. The permittee is required to maintain documentation as required by 63.4530(c), and submit reports demonstrating compliance, as required in 63.4520.

f. The permittee has elected to use the compliance option provided by 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 63.4550, 63.4551, and 63.4552 to demonstrate compliance with the emissions limit using this option.

g. The permittee may use any of the three compliance options described in 63.4491(a), (b), or (c), however the permittee must meet all of the requirements of each option when it is used. The permittee is required to notify the Ohio EPA, Northwest District Office prior to the use of the compliance option described in 63.4491(c), since this option requires emissions testing to confirm the organic HAP emission reduction efficiency of the capture and control system.

Also, if the permittee switches compliance options for this coating operation, the permittee must document this as required by 63.4530(c), and report it in the next semi-annual compliance report required in 63.4520. Nothing in this permit is intended to prevent the facility from switching between any compliance options provided under 40 CFR 63, Subpart PPPP, as expeditiously as allowed under that rule. [See 40 CFR 63.4480-4581.]

h. The permittee shall include all coatings, thinners, and/or other additives, and cleaning materials (as defined in 63.4581), used in the coating operation when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 63.4490.

c) Operational Restrictions

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

Subpart PPPP section	**Subpart PPPP requirement**
63.4492(a)	For any coating operation on which the "compliant materials" option or the "emissions rate without add-on controls" option is used, the permittee is not required to meet any operating limits.
63.4493(a)	For any coating operation on which the "complaint materials" option or the "emissions rate without add-on controls" option is used, the permittee is not required to meet any work practice standards.

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

(2) If the permittee elects to change the current compliance option identified in b)(2)e., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate operating and work practice requirements for the selected option. Specifically, use of the "emissions rate with add-on controls" option in 40 CFR 63.4491(c), requires the permittee to meet the operating requirements in 40 CFR 63.4492(b) and/or (c), and the work practice standards in 40 CFR 63.4493(b) and/or (c). See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall utilize an information management system, previously approved by the Director (the appropriate Ohio EPA Destrict Office or local air agency) for this emissions unit which is capable of processing the appropriate input data in order to generate the following required records:

a. Pounds VOC/day; and

b. Tons VOC per rolling, 365-day period.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

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

Subpart PPPP section	**Subpart PPPP requirement**
63.4530(a)	Requirement to keep a copy of each notification and report, along with supporting documentation; requirement to keep records of the data and calculations used to determine the predominant activity.
63.4530(b)	Requirement to keep a current copy of materials suppliers or manufacturers information, such as formulation or test data.
63.4530(c)(1) and (c)(3)	For each compliance period: Requirement to keep a record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option used, for each compliance period. For the “emissions rate without add-on controls” compliance option, requirement to keep a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month; the calculation of the total mass of coating solids used each month; and the calculation of each 12-month

	organic HAP emissions rate.
63.4530(d)	Requirement to keep a record of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period.
63.4530(e)	Requirement to keep a record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
63.4530(f)	Requirement to keep a record of the mass fraction of coating solids for each coating used during each compliance period.
63.4530(g)	Recordkeeping requirement that applies if the company uses an allowance for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF).
63.4530(h)	Requirement to keep records of the date, time, and duration of each deviation.
63.4531(a)	Requirements to keep records in a form suitable and readily available for expeditious review.
63.4531(b)	Requirement to keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
63.4531(c)	Requirement to keep each record on-site for 2 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
63.4550	Timeline for conducting the initial compliance demonstration when using the “emissions rate without add-on controls” compliance option.
63.4551	Calculations for conducting initial compliance demonstrations when using the “emissions rate without add-on controls” compliance option.

63.4552	Methodology for demonstrating continuous compliance with the emission limitations when using the "emissions rate without add-on controls" compliance option.

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

(3) If the permittee elects to change the current compliance option identified in b)(2)e., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate monitoring and recordkeeping requirements for the selected option. Specifically, use of the "compliant materials" option requires compliance with the recordkeeping requirements in 63.4530(c)(2), and 63.4540, 63.4541, and 63.4542. Use of the "emissions rate with add-on controls" option requires compliance with the recordkeeping requirements in 63.4530(c)(4), and 63.4560, 63.4561, 63.4563, 63.4564, 63.4565, 63.4566, 63.4567, and 63.4568. See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. An identification of each day during which there was an exceedance of the daily emission limitation of 82.80 pounds VOC/day; and

b. An identification of any exceedances of the annual VOC emission limitation of 5.0 tons VOC per rolling, 365-day period.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

(2) 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:

Subpart PPPP section	**Subpart PPPP requirement**
63.4510(a)	General – submit notifications in 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the permittee by the dates specified in those sections, except as provided in 63.4510(b).
63.4510(b)	Initial notification – for an existing affected source, you must submit the initial notification no later than 1 year after April

	19, 2004; for a new or reconstructed affected source you must submit the initial notification required by 63.9(b) no later than 120 days after initial startup or 120 days after April 19, 2004, whichever is later.
63.4510(c)	Notification of compliance status – the permittee shall submit the notification of compliance status required by 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 63.4540, 63.4550, or 63.4560 that applies to your affected source, and shall include the information specified in paragraphs (c)(1) through (c)(11), and in 63.9(h).
63.4520(a)	Semiannual compliance reports – the permittee must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (a)(7) of this section.

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

(3) If the permittee elects to change the current compliance option identified in b)(2)e., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate reporting requirements for the selected option. Specifically, use of the "emissions rate with add-on controls" option in 40 CFR 63.4491(c), requires the permittee to meet the reporting requirements in 40 CFR 63.4520(b) and (c). See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

f) Testing Requirements

(1) Compliance with the emission limitation(s) in Section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. <u>Emission Limitation</u>:

82.80 lbs VOC/day and 5.0 tons VOC per rolling, 365-day period

<u>Applicable Compliance Method</u>:

The record keeping requirements specified in Section d)(1) of this permit shall be used to determine compliance with the daily and annual VOC emission limitations.

[OAC rule 3745-77-07(C)(1) and PTI #03-13836]

b. Emission Limitation:

The permittee shall comply with one of the four emissions limits identified in 40 CFR 63.4490(b)(1) through (4), or comply as provided in 40 CFR 63.4490(c). In accordance with 40 CFR 63.4490(c)(1), this emissions unit currently meets the applicability criteria of both the general use category and thermoplastic olefin (TPO) use category, and is complying with the emissions limit for the general use category which comprises 90% or more of the surface coating operations at the facility. For each existing general use coating affected source, the permittee is required to 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 record keeping requirements specified in Section d)(4) of this permit shall be used to determine compliance with the HAP emissions limit, for this affected source using the "emission rate without add-on controls" option found in 40 CFR 63.4491(b).

If the permittee elects to change the current compliance option identified in b)(2)o., with another compliance option identified in 40 CFR 63.4491, the permittee shall maintain compliance with the appropriate testing/compliance demonstration requirements for the selected option. See 40 CFR Part 63, Subpart PPPP (40 CFR 63. 4480-4581).

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

g) Miscellaneous Requirements

(1) If the permittee chooses to use an add-on control device other than those listed in Table 1 to 40 CFR Part 63, Subpart PPPP, or chooses to monitor an alternative parameter and comply with a different operating limit, the permittee must apply to the Administrator of the USEPA for approval of the alternative monitoring under 63.8(f). See 40 CFR 63.4492(c).

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

5. R001, Paint Suppliers Lab

Operations, Property and/or Equipment Description:

Paint suppliers lab spray booth

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 #03-4102, issued 02-08-1989)	See b)(2)a.
b.	OAC rule 3745-21-07(G)(2)	8.0 lbs volatile organic compounds (VOC)/hr, not to exceed 40 lbs VOC/day See b)(2)b.

(2) Additional Terms and Conditions

a. The requirements of this rule include compliance with the requirements of OAC rule 3745-21-07(G)(2).

b. 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)b., d)(1), e)(1), and f)(1)

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S.EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S.EPA approves the rule revision:

None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for the coating operation:

a. The company identification for each coating material employed;

b. The number of gallons of each coating material employed;

c. The organic compound content of each coating material, in pounds per gallon;

d. The total organic compound emission rate for all coating materials, in pounds per day;

e. The total number of hours the emissions unit was in operation; and

f. The average hourly organic compound emission rate for all coating materials, i.e., in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

[OAC rule 3745-77-07(C)(1) and PTI #03-4102]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. An identification of each day during which the average hourly organic compound emissions from the coating materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

b. An identification of each day during which the organic compound emissions from the coating materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-4102]

f) Testing Requirements

(1) Compliance with the emission limitation(s) in Section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

8.0 lbs volatile organic compounds (VOC)/hr, not to exceed 40 lbs VOC/day

Applicable Compliance Method:

The record keeping requirements specified in Section d)(1) of this permit shall be used to determine compliance with the VOC emissions limit.

[OAC rule 3745-77-07(C)(1) and PTI #03-4102]

g) Miscellaneous Requirements

(1) None.