



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

12/31/2009

Mr. Philip Tischler, BSME
A.J. Oster Foils LLC
2081 McCrea Street
Alliance, OH 44601

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1576011632
Permit Number: P0104770
Permit Type: Renewal
County: Stark

Certified Mail

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

Dear Permit Holder:

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

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

and Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Canton City Health Department at (330)489-3385.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Canton; Pennsylvania; West Virginia



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: The A.J. Oster Foils, LLC facility in Stark County is a metal foil processing plant with two rotogravure coating lines, emissions units K001 and K002. The metal foil is conveyed through let-off roll (unwind) stations to the coating rolls, then passed through gas-fired drying ovens to take-up roll (rewind) stations. Fumes are exhausted through the oven stacks to the atmosphere, with no emissions control equipment employed.
3. Facility Emissions and Attainment Status: Emissions from the coating lines consist of volatile organic compounds (VOC) and hazardous air pollutants (HAP) in the applied coatings. Products of natural gas combustion from the drying ovens are negligible. Stark County is considered nonattainment for National Ambient Air Quality Standards (NAAQS) particulate matter 2.5 microns in diameter or less (PM_{2.5}), and attainment for the rest of the criteria pollutants.
4. Source Emissions: The potential to emit (PTE) of VOC from emissions units K001 and K002, combined, is 102.2 tons per year (TPY) VOC. The permittee is requesting a restriction of 99.0 TPY VOC on facility-wide emissions. The permittee is also requesting the 2.4 lbs VOC per gallon limit for K001 be raised to 2.6 lbs VOC per gallon. Since there is an increase in the allowable VOC emissions from previously permitted amounts, this permit is considered a chapter 31 modification. However, according to the guidelines for transitioning non-Title V sources into the PTIO program, the first PTIO issued for an air contaminant source already issued a PTI or PTO must be processed as a renewal regardless of the action that triggered the need for the PTIO.

The PTE of HAP from emissions units K001 and K002, combined, is 41.6 TPY for the highest single HAP (triethylamine) and the total HAP emissions. The facility has the potential to be a Title V source for VOC and HAP emissions. The synthetic minor strategy for avoiding Title V permitting requirements consists of the use of rolling, 12-month VOC and HAP emission limitations. The synthetic minor PTE of VOC from emissions units K001 and K002, combined, in this permit is 99.0 TPY VOC. The synthetic minor PTE of HAP from emissions units K001 and K002, combined, in this permit is 9.0 TPY for the highest single HAP and 24.0 TPY for the total HAP emissions. Air Toxics were not modeled, since there is no increase in the allowable HAP emissions.

5. Conclusion: Compliance with the rolling, 12-month VOC and HAP emission limitations, along with the 40 CFR Part 60, Subpart TT limitations and compliance with the associated recordkeeping and reporting requirements in the permit, will ensure the facility remains a synthetic minor, through OAC rule 3745-31-05(D), with respect to VOC and HAP emissions, and will avoid major stationary source Title V status.
6. Please provide additional notes or comments as necessary: Coating rotation, machine inefficiencies, and operating schedules less than 8760 hours per year keep the actual emissions from the facility well below the synthetic minor limits. The facility-wide reported emissions for 2008 were 1.71 tons, and 0.52 tons for the first half of 2009. By maintaining actual emission records showing that emissions are less than twenty percent of the Title V thresholds, A.J. Oster Foils, LLC could qualify for presumed inherent physical limitations per Engineering Guide #61, but have requested synthetic minor limits instead.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0104770
Facility ID: 1576011632

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	99.0
Single HAP	9.0
Multiple HAP	24.0

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
A.J. Oster Foils LLC

Issue Date: 12/31/2009
Permit Number: P0104770
Permit Type: Renewal
Permit Description: FEPTIO for metal foil coating lines K001 and K002.
Facility ID: 1576011632
Facility Location: A.J. Oster Foils LLC
2081 MCCREA STREET,
ALLIANCE, OH 44601
Facility Description: Metal Service Centers and Other Metal Merchant Wholesalers

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Greg Clark at Canton City Health Department, 420 Market Avenue or (330)489-3385 . The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

**Air Pollution Permit-to-Install and Operate
for
A.J. Oster Foils LLC**

Facility ID: 1576011632
Permit Number: P0104770
Permit Type: Renewal
Issued: 12/31/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
A.J. Oster Foils LLC

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Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104770

Facility ID: 1576011632

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1576011632
Application Number(s): A0036707
Permit Number: P0104770
Permit Description: FEPTIO for metal foil coating lines K001 and K002.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 12/31/2009
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

A.J. Oster Foils LLC
2081 MCCREA STREET
ALLIANCE, OH 44601

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

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

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104770

Facility ID: 1576011632

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0104770

Permit Description: FEPTIO for metal foil coating lines K001 and K002.

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

Group Name: Metal Coil Coating Lines

Emissions Unit ID:	K001
Company Equipment ID:	Coater 1
Superseded Permit Number:	P0101162
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Coater 2
Superseded Permit Number:	15-01649
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104770

Facility ID: 1576011632

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

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

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104770

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Effective Date: To be entered upon final issuance

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104770

Facility ID: 1576011632

Effective Date: To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) Term C.1.b)(1)b.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104770

Facility ID: 1576011632

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group - Metal Coil Coating Lines: K001, K002,

EU ID	Operations, Property and/or Equipment Description
K001	Metal rotogravure coating line #1 (max. width: 3.4 ft, max. speed: 300 ft/min) Unwind station to payoff foil to rotogravure coating station. Coated foil to gas fired oven drying. Fumes exhausted through roof. Coated foil to rewind.
K002	Metal rotogravure coating line #2 (max. width: 4.0 ft, max. speed: 500 ft/min) Unwind station to payoff foil to rotogravure coating station. Coated foil to gas fired oven drying. Fumes exhausted through roof. Coated foil to rewind.

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

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

a. None.

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

a. Term C.1.b)(1)b.

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)	22.8 lbs VOC/hr See b)(2)a. and c)(2)
b.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V	See b)(2)b.
c.	OAC rule 3745-21-09(E)	2.6 lbs VOC/gal of coating, excluding water and exempt solvents. See b)(2)c. and c)(3)
e.	40 CFR Part 60, Subpart TT (40 CFR 60.460-466) The following limit is for emissions units K001 and K002, combined. [In accordance with 40 CFR 60.462(a)(1), these emission units are metal coil surface coating operations, constructed after	0.28 kg VOC/ l of coating solids applied for each calendar month. See b)(2)d. [40 CFR 60.462(a)(1)]



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	January 5, 1981, that do not use an emission control device(s) and are subject to the emission limitations/control measures specified in this section.]	
	40 CFR Part 60, Subpart A (40 CFR 60.1-19)	General Provisions

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D), 3745-21-09(E) and 40 CFR Part 60, Subpart TT.
- b. Facility-wide emissions shall not exceed 9.0 tons of any single Hazardous Air Pollutant (HAP), 24.0 tons of total combined HAPs, and 99.0 tons of Volatile Organic Compounds (VOC) per rolling, 12-month period.

Facility-wide emissions shall be determined from a summation of monthly emissions from emissions units K001 and K002. These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the monthly emissions upon issuance of this permit.

A listing of HAPs can be found in Section 112(b) of the Clean Air Act and Ohio Administrative Code (OAC) rule 3745-114.

- c. The averaging of VOC emissions over two or more coating lines in order to demonstrate compliance with this applicable emission limitation is prohibited.
- d. The requirements specified in 40 CFR Part 60, Subpart TT shall not apply during periods when the thickness of metal coil being coated is less than 0.15 millimeter (0.006 inch).

c) Operational Restrictions

- (1) The drying oven shall be fired with natural gas only.
- (2) The emissions from emissions units K001 and K002, individually, shall not exceed 22.8 pounds of VOC per hour.
- (3) The permittee shall not discharge into the ambient air any VOCs in excess of 2.6 pounds of VOC per gallon of coating, excluding water and exempt solvents.

d) Monitoring and/or Recordkeeping Requirements

- (1) 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 these emissions units.



- (2) The permittee shall collect and record the following information for each day of the coating operations and maintain the information at the facility for a period of three years:
- a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating in pounds of VOC per gallon of coating, as applied;
 - c. the VOC content of each coating in pounds of VOC per gallon of coating (excluding water and exempt solvents), as applied;
 - d. the volume, in gallons, of each coating (excluding water and exempt solvents), as applied;
 - e. the density of each coating employed, in pounds of coating per gallon of coating;
 - f. the non-volatile (solids) content of each coating employed, in percent by volume;
 - g. the maximum HAP content of each coating employed, in percent by weight;
 - h. the name and identification of each cleanup material employed;
 - i. the VOC content of each cleanup material employed, in pounds per gallon;
 - j. the volume, in gallons, of each cleanup material employed;
 - k. the number of hours the emissions unit was operated;
 - l. the average, hourly VOC emission rate, in pounds per hour; and
 - m. the daily volume-weighted average VOC content of all coatings, as applied, in pounds of VOC per gallon of coating, excluding water and exempt solvents, calculated in accordance with the equation specified in paragraph (B)(9) of rule 3745-21-10 of the Administrative Code for $C_{voc,2}$.

i.
$$C_{voc,2} = (D_c)(W_{VOC}) / (V_s + V_{VOC})$$

Where:

D_c = density of coating (pound per gallon)

V_s = volume fraction of solids in coating (gallon of solids per gallon of coating)

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

W_{VM} = weight fraction of volatile matter in coating (pound of volatile matter per pound of coating)

W_W = weight fraction of water in coating (pound of water per pound of coating)

W_{ES} = weight fraction of exempt solvent in coating (pound of exempt solvent per pound of coating)



$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

V_{VM} = volume fraction of volatile matter in coating (gallon of volatile matter per gallon of coating)

V_W = volume fraction of water in coating (gallon of water per gallon of coating)

V_{ES} = volume fraction of exempt solvent in coating (gallon of exempt solvent per gallon of coating)

- (3) The permittee shall comply with the applicable compliance provisions and monitoring requirements pursuant to 40 CFR Part 60, Subpart TT, Sections 60.463(c)(1) and 60.464(a).

The permittee shall compute and record the average VOC content of coatings applied during each calendar month for each emissions unit. The composition of the coatings shall be determined by formulation data supplied by the manufacturer of the coating, or by an analysis of each coating, as received, using Method 24. The volume-weighted average of the total mass of VOCs consumed per unit volume of coating solids applied during each calendar month shall be determined by the following procedure:

- a. Calculate the mass of VOCs used ($M_o + M_d$) during each calendar month for the facility by the following equation:

$$M_o + M_d = \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj}$$

($\sum L_{dj} D_{dj}$ will be 0 if no VOC solvent is added to the coatings, as received)

Where:

D_c = density of each coating, as received (kilograms per liter)

D_d = density of each VOC-solvent added to coatings (kilograms per liter)

L_c = the volume of each coating consumed, as received (liters)

L_d = the volume of each VOC-solvent added to coatings (liters)

m = the number of different VOC solvents added to coatings used during the calendar month

M_d = the mass of VOC-solvent added to coatings (kilograms)

M_o = the mass of VOCs in coatings consumed, as received (kilograms)

n = the number of different coatings used during the calendar month

W_o = the proportion of VOC's in each coating, as received (fraction by weight)



- b. Calculate the total volume of coating solids used (L_s) in each calendar month for the facility by the following equation:

$$L_s = \sum_{i=1}^n V_s L_{ci}$$

Where:

L_c = the volume of each coating consumed, as received (liters)

n = the number of different coatings used during the calendar month

V_s = the proportion of solids in each coating, as received (fraction by volume)

- c. Calculate the volume-weighted average mass of VOCs used per unit volume of coating solids applied (G) during the calendar month for the facility by the following equation:

$$G = \frac{M_o + M_d}{L_s}$$

Where:

L_s = the total volume of coating solids used (liters)

M_d = the mass of VOC-solvent added to coatings (kilograms)

M_o = the mass of VOCs in coatings consumed, as received (kilograms)

- (4) The permittee shall calculate a rolling, 12-month summation of the monthly emissions, in tons, from emissions units K001 and K002, combined, for any single HAP, multiple HAPs, and VOCs.
- (5) The permittee shall comply with the applicable recordkeeping requirements pursuant to 40 CFR Part 60, Subpart TT, Section 60.465(e) by maintaining at the source, for a period of at least two years, records of all data and calculations used to determine monthly VOC emissions from each emissions unit.
- e) Reporting Requirements
- (1) The permittee shall notify the Canton Local Air Agency of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable emission limitation of 2.6 lbs VOC per gallon, within forty-five days after the exceedance occurs.
- (2) The permittee shall notify the Canton Local Air Agency, in writing, of any monthly record that does not comply with the facility-wide VOC and HAP rolling, 12-month emissions limits, within 30 days following the end of the calendar month in which the deviation occurred.
- (3) The permittee shall comply with the applicable reporting and recordkeeping requirements pursuant to 40 CFR Part 60, Subpart TT, Section 60.465(c).



The permittee shall identify, record, and submit a written report to the Administrator (the appropriate Ohio EPA District Office or local air agency) every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids is greater than 0.28 kg VOC/ l. If no such instances have occurred during a particular quarter, a report stating this shall be submitted semiannually. The reports shall be submitted electronically through Ohio EPA Air Services each year by July 31st (covering January to June) and January 31st (covering July to December).

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

The permittee shall identify the following information in the annual permit evaluation report:

- a. all deviations (excursions) of the following emission limitations or operational restrictions that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all periods of time during which a fuel other than natural gas was burned in these emissions units;
 - ii. any daily record showing the emissions from emissions units K001 and K002, individually, exceeded 22.8 pounds of VOC per hour;
 - iii. any daily record showing more than 2.6 pounds of VOC per gallon of coating, excluding water and exempt solvents, discharged into the ambient air;
 - iv. any monthly record showing the volume-weighted average of the total mass of VOCs consumed per unit volume of coating solids applied during each calendar month exceeded 0.28 kilograms VOC per liter; and
 - v. any record showing the facility-wide emissions exceeded 9.0 tons of any single Hazardous Air Pollutant (HAP), 24.0 tons of total combined HAPs, and 99.0 tons of Volatile Organic Compound (VOC) per rolling, 12-month period.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).



f) Testing Requirements

(1) Compliance with the emissions limitations in section C.1.b)(1) of this permit shall be determined in accordance with the following methods:

a. Emissions Limitation:

22.8 lbs VOC/hr

Applicable Compliance Method:

Compliance is demonstrated through the use of monitoring and record keeping as specified in section C.1.d).

If required, compliance shall be demonstrated by emissions tests performed in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Method 25 or 25A.

b. Emissions Limitation:

2.6 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance is demonstrated through the use of monitoring and record keeping as specified in section C.1.d).

c. Emissions Limitation:

0.28 kilogram VOC per liter (kg VOC/ l) of coating solids applied for each calendar month.

Applicable Compliance Method:

Compliance is demonstrated through the use of monitoring and record keeping as specified in section C.1.d).

The permittee shall comply with the applicable test methods and procedures pursuant to 40 CFR Part 60, Subpart TT, Section 60.466(a). Method 24, or data provided by the formulator of the coating, shall be used for determining the VOC content of each coating as applied to the surface of the metal coil. In the event of a dispute, Method 24 shall be the reference method.

d. Emissions Limitation:

The permittee shall not emit quantities exceeding 9.0 tons per year of any single HAP, 24.0 tons per year of multiple HAPs, and 99.0 tons per year of VOCs as a rolling, 12-month summation from emissions units K001 and K002, combined.

Applicable Compliance Method:

Compliance is demonstrated through the use of monitoring and record keeping as specified in section C.1.d).



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0104770

Facility ID: 1576011632

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.