State of Ohio Environmental Protection Agency

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1/11/2010

Certified Mail

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

FRANK MORITZ
MORITZ INTERNATIONAL INC.
665 NORTH MAIN ST.
MANSFIELD, OH 44902

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0370010048
Permit Number: P0087512
Permit Type: Renewal
County: Richland

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very 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.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.ohio.gov/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO 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

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: Ohio EPA-NWDO

**State of Ohio Environmental Protection Agency**
**Division of Air Pollution Control**

# FINAL

# Air Pollution Permit-to-Install and Operate
for
MORITZ INTERNATIONAL INC.

Facility ID: 0370010048
Permit Number: P0087512
Permit Type: Renewal
Issued: 1/11/2010
Effective: 1/11/2010
Expiration: 1/11/2015

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

# Air Pollution Permit-to-Install and Operate
for
MORITZ INTERNATIONAL INC.

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# Authorization

Facility ID: 0370010048
Application Number(s): A0018513
Permit Number: P0087512
Permit Description: Renewal FEPTIO for a miscellaneous metal parts coating operation
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 1/11/2010
Effective Date: 1/11/2010
Expiration Date: 1/11/2015
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

MORITZ INTERNATIONAL INC.
665 NORTH MAIN ST.
MANSFIELD, OH 44902

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:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

# Authorization (continued)

Permit Number: P0087512
Permit Description: Renewal FEPTIO for a miscellaneous metal parts coating operation

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

| | |
|---|---|
| **Emissions Unit ID:** | **K001** |
| Company Equipment ID: | Misc. Metal Parts Spraybooth |
| Superseded Permit Number: | 03-16139 |
| General Permit Category and Type: | Not Applicable |

# A. Standard Terms and Conditions

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

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

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

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

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

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

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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

# B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

# C. Emissions Unit Terms and Conditions

## 1. K001, Misc. Metal Parts Spraybooth

**Operations, Property and/or Equipment Description:**

Miscellaneous metal parts paint spray booth number 1

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. b)(1)b., b)(2)b., b)(2)d., c)(1), d)(2), d)(4), d)(5), e)(1), f)(1)c. and f)(1)d.

(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. d)(6) through d)(8).

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) | 26.25 lbs volatile organic compounds (VOC)/hr from coating operations<br><br>621.4 lbs organic compounds (OC)/month and 3.73 tons OC/yr from cleanup operations [See b)(2)c. and c)(2)]<br><br>See b)(2)a. |
| b. | OAC rule 3745-31-05(D) | 26.25 tons VOC per rolling 12-month period [See b)(2)b.]<br><br>9.09 tons per rolling 12-month period for any individual Hazardous Air Pollutant (HAP) and 23.06 tons per rolling 12-month period for any combination of HAPs [See b)(2)d.] |
| c. | OAC rule 3745-21-09(U)(1)(c) | 3.5 lbs of volatile organic compound per gallon excluding water and exempt solvents, for an extreme performance coating |

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).

b. The emissions of VOC from emissions unit K001 shall not exceed 26.25 tons per year based on a rolling, 12-month summation of the monthly emissions. The federally enforceable VOC limitation is based on coating usage restrictions [See c)(1)] and VOC content requirements established by OAC rule 3745-21-09(U)(1)(c). Federally enforceable VOC limitations are being established for the purpose of avoiding Title V applicability [See c)(1)].

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

d. HAP emissions from emissions unit K001 shall not exceed 9.09 tons per year for any individual HAP and 23.06 tons per year for any combination of HAPs, based upon a rolling 12-month summation of the monthly HAP emissions.

Federally Enforceable HAP limitations are being established for purposes of avoiding MACT and Title V applicability.

Compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates.

c) Operational Restrictions

(1) The maximum annual coating usage for emissions unit K001 shall not exceed 15,000 gallons. The annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rate.

Compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for coating usage in emissions unit K001:

a. the company name and identification for each coating employed;

b. the VOC content of each coating, as applied, in lbs/gallon;

c. the VOC content of each coating (excluding water and exempt solvents), in lbs/gallon, as applied [the VOC content shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];

d. the number of gallons of each coating employed; and

e. the total VOC emission rate from all coatings employed, in lbs [summation of VOC emission rate [d)(1)b. x d)(1)d.] for each individual coating].

(2) In conjunction with the recordkeeping requirements specified in d)(1) above, the permittee shall also record the following information each month for emissions unit K001:

a. the total annual emissions of VOC, in tons, based on a rolling, 12-month summation.

(3) The permittee shall collect and record the following information each month for cleanup material usage in emissions unit K001:

a. the company name and identification for each cleanup material employed;

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

c. the OC content of each cleanup material employed, in lbs/gallon;

d. the number of gallons of each cleanup material employed;

e. the OC emission rate for each cleanup material employed, [d)(3)c. x d)(3)d.], in lbs/month;

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

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

f. the total OC emission rate, in tons, for all cleanup materials employed [sum of d)(3)e.]; and

g. the annual, year to date OC emissions, in tons, from all cleanup materials employed, [sum of d)(3)f.] for each calendar month to date from January to December).

(4) The permittee shall collect and record the following information regarding HAP emissions each month for emissions unit K001:

a. the company identification of each coating and cleanup material employed;

b. the lbs per gallon of each HAP in each coating and cleanup material, as applied;

c. the number of gallons of each coating and cleanup material employed;

d. the total emission rate for each HAP from all coatings and cleanup materials employed, [summation of each HAP emission rate {d)(4)b. x d)(4)c.} for each individual coating/cleanup material], in lbs/month;

e. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, [sum of d)(4)d. for all HAPs] in lbs/month;

f. the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

(5) In addition to the above information, the permittee shall also collect and record the following information each month for emissions unit K001:

a. the annual number of gallons of all coatings based upon a rolling, 12-month summation of the monthly coating usage rates.

(6) The permit to install for emission unit K001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the"worst case" pollutant(s):

Pollutant: methyl n-amyl ketone

TLV (mg/m3): 233.497

Maximum Hourly Emission Rate (lbs/hr): 10.727

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 5318.52

MAGLC (ug/m3): 5559

Pollutant: Ethylbenzene

TLV (mg/m3): 434.192

Maximum Hourly Emission Rate (lbs/hr): 1.533

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 760.07

MAGLC (ug/m3): 10338

Pollutant: xylene

TLV (mg/m3): 434.192

Maximum Hourly Emission Rate (lbs/hr): 8.149

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 4040.37

MAGLC (ug/m3): 10338

Pollutant: MIBK

TLV (mg/m3): 204.826

Maximum Hourly Emission Rate (lbs/hr): 9.094

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 4508.83

MAGLC (ug/m3): 4877

Pollutant: acetone

TLV (mg/m3): 11871.17

Maximum Hourly Emission Rate (lbs/hr): 18.070

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 8959.22

MAGLC (ug/m3): 28265

Pollutant: n-butyl acetate

TLV (mg/m3): 712.638

Maximum Hourly Emission Rate (lbs/hr): 1.731

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 858.41

MAGLC (ug/m3): 16968

Pollutant: 2-butoxy ethanol

TLV (mg/m3): 96.66

Maximum Hourly Emission Rate (lbs/hr): 3.822

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 1894.92

MAGLC (ug/m3): 2301

(7) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

(8) The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

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

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

i. any exceedances of the maximum allowable gallon usage rates specified in paragraph c)(1) of this permit;

ii. any exceedances of the maximum emission limitations for each HAP and total combined HAPs specified in paragraph b)(2)d. of this permit for emission unit K001; and

iii. any exceedances of the 26.25 tons VOC per rolling, 12-month period for emission unit K001.

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

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

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

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

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

(2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of a coating which does not comply with the 3.5 lbs VOC/gallon minus water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(3) The permittee shall notify the Director (the appropriate Ohio EPA 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 appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

(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 permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitation: 26.25 lbs VOC/hr

Applicable Compliance Method: The hourly VOC limitation is based on the emission unit's potential to emit*. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on a maximum hourly coating usage of 7.5 gallons and a maximum VOC content of 3.5 pounds per gallon.

b. Emission Limitation: 621.4 lbs OC/month and 3.73 tons OC/yr from cleanup materials

Applicable Compliance Method: Compliance with these limitations shall be demonstrated through the recordkeeping requirements in section d)(3) of this permit.

c. Emission Limitation: 26.25 tons VOC per rolling 12-month period

Applicable Compliance Method: Compliance with this limitation shall be demonstrated through the recordkeeping requirements in section d)(2) of this permit.

d. Emission Limitation: 9.09 tons per rolling 12-month period for any individual HAP and 23.06 tons per rolling 12-month period for any combination of HAPs

Applicable Compliance Method: Compliance with these limitations shall be demonstrated through the recordkeeping requirements in section d)(4) of this permit.

e. Emission Limitation: 3.5 pounds of VOC per gallon excluding water and exempt solvents for an extreme performance coating

Applicable Compliance Method: Compliance with this limitation shall be demonstrated through the recordkeeping requirements in section d)(1) of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coating(s).

g) Miscellaneous Requirements

(1) Permit to Install (PTI) #03-16139 was issued as a synthetic minor permit for emission units K001 and K002 and contained combined limits for these two emission units. K002 was never installed, therefore, any combined limits that were established for K001 and K002 in the PTI are now only for K001.