State of Ohio Environmental Protection Agency

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

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

1/11/2010

Certified Mail

Facility ID: 1431340977
Permit Number: P0099715
County: Hamilton

ROBERT SCHMIDT
SENCO PRODUCTS INC.
8450 BROADWELL RD.
CINCINNATI, OH 45244-1611

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 Hamilton County Dept. of Environmental Services. 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*
Hamilton County Dept. of Environmental Services

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

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

SENCO PRODUCTS INC.

Facility ID: 1431340977
Permit Number: P0099715
Permit Type: Renewal
Issued: 1/11/2010
Effective: 2/1/2010
Expiration: 2/1/2015

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Title V Permit to Control Air Pollution
OAC Chapter 3745-77
SENCO PRODUCTS INC.

Table of Contents

Authorization 1
A. Standard Terms and Conditions 2
1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Scheduled Maintenance 6
4. Risk Management Plans 6
5. Title IV Provisions 6
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 8
11. Reopening for Cause 8
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 10
15. Operational Flexibility 10
16. Emergencies 11
17. Off-Permit Changes 11
18. Compliance Method Requirements 12
19. Insignificant Activities or Emissions Levels 12
20. Permit to Install Requirement 12
21. Air Pollution Nuisance 12
22. Permanent Shutdown of an Emissions Unit 12
23. Title VI Provisions 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 13
25. Records Retention Requirements Under State Law Only 13
26. Inspections and Information Requests 13
27. Scheduled Maintenance/Malfunction Reporting 14
28. Permit Transfers 14

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 14

B. Facility-Wide Terms and Conditions 15

C. Emissions Unit Terms and Conditions 17

1. F001, WIRE DRAW MILLS 18
2. K005, BAND LINE 20
3. R001, AIR GUN FILTERS 29
4. K001 Band Line, ... 33
5. Emissions Unit Group - Band Lines (PTI 14-01339): K003, K004, ... 42
6. Emissions Unit Group - Coil Nail Coater: K281, K282, ... 49
7. Emissions Unit Group - Staple Machines: K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026, K027, K028, K029, K030, K031, K032, K033, K035, K036, K037, K038, K039, K040, K041, K042, K043, K044, K045, K046, K047, K048, K049, K050, K051, K052, K054, K055, K056, K057, K058, K059, K060, K061, K062, K063, K064, K065, K066, K067, K068, K069, K070, K071, K072, K073, K074, K075, K076, K077, K078, K079, K080, K081, K082, K083, K084, K085, K086, K087, K088, K089, K090, K091, K092, K093, K094, K095, K096, K097, K098, K099, K100, K101, K102, K103, K104, K105, K106, K107, K108, K109, K110, K130, ... 52

Authorization

Facility ID: 1431340977
Facility Description:
Application Number(s): A0031422
Permit Number: P0099715
Permit Description: Staple manufacturer.
Permit Type: Renewal
Issue Date: 1/11/2010
Effective Date: 2/1/2010
Expiration Date: 2/1/2015
Superseded Permit Number:

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

SENCO PRODUCTS INC.
8450 BROADWELL RD.
Cincinnati, OH 45244-1611

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

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

The above named entity is hereby granted 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 Hamilton County Dept. of Environmental Services. 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 Hamilton County Dept. of Environmental Services.
(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) None.

2. The following insignificant emissions units are located at this facility:

   B003 8.4 MMBtu/hr natural gas-fired boiler;
   B004 8.4 MMBtu/hr natural gas-fired boiler;
   K146 thru K252 staple machines (14-1288);
   K283 thru K302 collators (14-1288);
   K304 thru K342 staple machines (14-1288);
   K343 thru K369 nail collators (14-1288);
   L006 thru L029 non-halogenated solvent cold cleaners;
   P005 rotating barrel nail cleaner;
   P007 deburrer nail cleaner;
   P008 nail cleaner;
   P009 nail cleaner; and
   P010 thru P022 strip presses.

   Each 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 a permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21

C. Emissions Unit Terms and Conditions

1. F001, WIRE DRAW MILLS

Operations, Property and/or Equipment Description:

Wire Draw Mills

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 3745-17-07(B)	Pursuant to paragraph (B) (11) (e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to this emissions unit.
b.	OAC rule 3745-17-08(A)	This emissions unit is not located in an Appendix A area, pursuant to paragraph (A) (1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to the fugitive emissions from this emissions unit.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None

2. K005, BAND LINE

Operations, Property and/or Equipment Description:

Band Line controlled by a thermal oxidizer

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 14-01652)	39.47 TPY of Volatile Organic Compounds (VOC). See c)(1) and c)(3). The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(B)(6) and 3745-31-05(D).
b.	OAC rule 3745-21-09(B)(6)	See b)(2)a.
c.	OAC rule 3745-31-05(D)	See c)(2), c)(4), d)(1), e)(1), f)(1)a.
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See d)(2)-d)(11), e)(2)-e)(3), and f)(2).

(2) Additional Terms and Conditions

a. This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds:

i. an overall reduction efficiency which is at least 81 percent, by weight; and

ii. a control efficiency which is at least 90 percent, by weight.

c) Operational Restrictions

(1) The VOC content of coatings employed in this emission unit shall not exceed 6.0 lbs VOC/gallon.

(2) The amount of coatings employed in this emission unit shall not exceed 5619.9 gallons per month.

(3) The VOC content of clean-up materials employed in this emission unit shall not exceed 6.6 lbs VOC/gallon.

(4) The amount of clean-up material employed shall not exceed 26.25 gallons per month.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D) and 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number of each coating employed;

b. the VOC content of each coating employed(as applied), recorded in pounds of VOC per gallon of coating;

c. the total number of gallons of <u>each</u> coating employed;

d. the total number of gallons of <u>all</u> coatings employed;

e. the name and identification number for each cleanup material employed;

f. the VOC content of each cleanup material(as applied), recorded in pounds of VOC per gallon;

g. the total number of gallons of <u>each</u> cleanup material employed;

h. the total number of gallons of <u>all</u> cleanup material employed;

i. the monthly VOC emission totals from this emission unit (the summation of d)(1)b * d)(1)c for each coating employed + d)(1)f *d)(1)g for each clean up material employed multiplied by the overall control efficiency demonstrated during the most recent stack test); and

j. the year to date VOC emission totals (the VOC monthly emission total calculated in d)(1)i added to the previous 11 month emission totals recorded in d)(1)i

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D) and 3745-77-07(A)(1))

(2) The CAM plan for monitoring the control efficiency for the thermal oxidizer controlling this emission is based on measuring the temperature within the combustion chamber of the thermal oxidizer. The indicator range for the temperature within the combustion chamber of the thermal oxidizer was set at a value not to be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was in compliance.

Acceptable values for the temperature of the combustion chamber of the thermal oxidizer are those values that fall within the indicator range specified above.

The indicator range noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the ranges above based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: 40 CFR Part 64 CAM and 3745-77-07(A)(1))

(3) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

Upon detecting an excursion of the thermal oxidizer temperature indicator range listed in d)(2), the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion.

(Authority for term: 40 CFR Part 64 CAM, 3745-21-09(B), and 3745-77-07(A)(1))

(4) Whenever the monitored values for the average temperature within the combustion chamber of the thermal oxidizer deviate from the indicator range specified in d)(2), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began and ended;

b. the magnitude of the deviation;

c. the date(s) the investigation was conducted;

d. the names of the personnel who conducted the investigation; and

e. the findings and recommendations of the investigation.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1))

(5) In response to each required investigation required in d)(4) to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the indicator range specified in d)(2). The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1))

(6) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1))

(7) The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the static pressure measured at the inlet plenum to the thermal oxidizer. The indicator range was set at a value such that the 3-hour average static pressure measured at the inlet plenum to the thermal oxidizer shall be maintained at a value at least 2.7 inches of water or at least 90% of the value recorded during the most recent emissions test that demonstrated the emissions unit(s) was in compliance.

Acceptable values for static pressure measured at the inlet plenum to the thermal oxidizer are those values that fall within the indicator range specified above.

The indicator range noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the ranges above based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1)]

(8) The permittee shall properly install, operate, and maintain equipment to monitor and record the static pressure at the inlet plenum to the thermal oxidizer while the emissions unit is in operation. Units shall be in inches of water. The monitoring and recording

equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average static pressure measured at the inlet plenum to the thermal oxidizer was less than the indicator range specified in d)(7); and

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring and recording equipment, and the associated emissions unit(s).

Upon detecting an excursion of the thermal oxidizer static pressure indicator range listed in d)(7), the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion.

[Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1)]

(9) Whenever the monitored values for the average static pressure measured at the inlet plenum to the thermal oxidizer deviate from the indicator range specified in d)(7), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began and ended;

b. the magnitude of the deviation;

c. the date(s) the investigation was conducted;

d. the names of the personnel who conducted the investigation; and

e. the findings and recommendations of the investigation.

[Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1)]

(10) In response to each required investigation required in d)(9) to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the indicator range specified in d)(7). The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1)]

(11) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

[Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1)]

(12) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-01652: d)(1)-d)(11). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit a quarterly deviation (excursion) report for any exceedance of the limitations specified in c)(1)-c)(4) or the VOC emission limitation specified in b)(1)a.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D) and 3745-77-07(A)(1))

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the thermal oxidizer during the operation of the emissions unit(s):

a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified in d)(2);

b. each period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;

c. an identification of each incident of deviation described in e)(2)a or e)(2)b (above) where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in e)(2)a or e)(2)b where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in e)(2)a or e)(2)b where proper records were not maintained for the investigation and/or the corrective action(s).

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

(Authority for term: 40 CFR Part 64 CAM, 3745-21-09(B), and 3745-77-07(A)(1))

(3) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the thermal oxidizer during the operation of the emissions unit(s):

a. each period of time (start time and date, and end time and date) when the static pressure at the inlet plenum to the thermal oxidizer was outside of the range specified in d)(7);

b. each period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;

c. an identification of each incident of deviation described in e)(3)a or e)(3)b (above) where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in e)(3)a or e)(3)b where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the static pressure at the inlet plenum to the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in e)(3)a or e)(3)b where proper records were not maintained for the investigation and/or the corrective action(s).

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-01652: e)(1)-e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install

f) Testing Requirements

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

a. Emission Limitation

See c)(1)-c)(4) for coating and cleanup usage and VOC content restrictions.

Applicable Compliance Method

Compliance with the coating and cleanup usage and VOC content restrictions may be demonstrated by the information collected and recorded in d)(1).

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D) and 3745-77-07(A)(1))

b. Emission Limitation

39.47 TPY of VOC

Applicable Compliance Method

Compliance with the TPY VOC emission limitation may be demonstrated by the information collected and recorded in d)(1)j.

(Authority for term: OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1))

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted within six-months of permit expiration.

The emission testing shall be conducted to demonstrate compliance with the capture and control requirements specified in b)(2)a.

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The permittee shall record the temperature within the combustion chamber of the thermal oxidizer and the static pressure at the inlet plenum to the thermal oxidizer during each testing run. At a minimum the temperature and static pressure shall be recorded at 15 minute intervals.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-01652: f)(1)-f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

3. R001, AIR GUN FILTERS

Operations, Property and/or Equipment Description:

Miscellaneous metal parts coating line (Special Equipment Department)

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 3745-17-11(C)(1)	See b)(2) and c)(1).
b.	OAC rule 3745-21-09(U)(1)(c)	The volatile organic compound (VOC) content (as applied) of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

(2) Additional Terms and Conditions

a. 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.

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

c) Operational Restrictions

(1) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

(Authority for term: OAC rules 3745-17-11(C)(1) and 3745-77-07(A)(1))

(2) 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.

(Authority for term: OAC rules 3745-17-11(C)(2)(e) and 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(Authority for term: OAC rules 3745-17-11(C)(2)(a) and 3745-77-07(C)(1))

(2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request

(Authority for term: OAC rules 3745-17-11(C)(2)(c) and 3745-77-07(A)(1))

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(Authority for term: OAC rules 3745-17-11(C)(2)(c) and 3745-77-07(A)(1))

(4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(Authority for term: OAC rules 3745-17-11(C)(2)(d) and 3745-77-07(A)(1))

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

well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(Authority for term: OAC rules 3745-17-11(C)(2)(f)-(g) and 3745-77-07(A)(1))

(6) The permittee shall collect and record the following information each month for coatings employed in this emission unit:

a. the name and identification number of each coating employed; and

b. the VOC content of each coating (excluding water and exempt solvents), as applied. The VOC content shall be calculated as specified in OAC rule 3745-21-10(B)(8).

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a permit to install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

(Authority for term: OAC rules 3745-21-10(B)(8), 3745-21-09(B)(3), and 3745-77-07(A)(1))

e) Reporting Requirements

(1) 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 non-complying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-21-09(B)(3)(g) and 3745-77-07(A)(1))

(2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of 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;

(Authority for term: OAC rules 3745-15-03(B)(1)(a) and 3745-77-07(A)(1))

f) Testing Requirements

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

a. Emission Limitation

3.5 lbs of VOC per gallon of coating excluding water and exempt solvents.

Applicable Compliance Method

If required, USEPA Methods 24 shall be used to determine the VOC content for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

(Authority for term: OAC rules 3745-21-10(B) and 3745-77-07(A)(1))

g) Miscellaneous Requirements

(1) None.

4. K001 Band Line,

Band Line controlled by a thermal oxidizer

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 14-01339)	5.70 lbs VOC/hour See c)(1) and c)(3). The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(B)(6) and OAC rule 3745-31-05(D).
b.	OAC rule 3745-21-09(B)(6)	See b)(2)a.
c.	OAC rule 3745-31-05(D)	See c)(2), c)(4) d)(1), e)(1), f)(1)a.
d.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See d)(2)-d)(11), e)(2)-e)(3), and f)(2).

(2) Additional Terms and Conditions

a. This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds:

i. an overall reduction efficiency which is at least 81 percent, by weight; and

ii. a control efficiency which is at least 90 percent, by weight.

c) Operational Restrictions

(1) The VOC content of coatings employed in this emission unit shall not exceed 5.92 lbs VOC/gallon.

(2) The amount of coatings employed in this emission unit shall not exceed 5483 gallons per month.

(3) The permittee shall employ only Acetone as a clean-up material in this emission unit.

(4) The amount of clean-up material (Acetone) employed shall not exceed 850 gallons per year based on a rolling, 12-month summation.

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number of each coating employed;

b. the VOC content of each coating employed(as applied), recorded in pounds of VOC per gallon of coating;

c. the total number of gallons of <u>each</u> coating employed;

d. the total number of gallons of <u>all</u> coatings employed;

e. the name and identification number for each cleanup material employed;

f. the VOC content of each cleanup material(as applied), recorded in pounds of VOC per gallon;

g. the total number of gallons of <u>each</u> cleanup material employed;

h. the total number of gallons of <u>all</u> cleanup material employed; and

i. the rolling, 12-month summation for the number of gallons of cleanup material employed.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D) and 3745-77-07(A)(1))

(2) The CAM plan for monitoring the control efficiency for the thermal oxidizer controlling this emission is based on measuring the temperature within the combustion chamber of the thermal oxidizer. The indicator range for the temperature within the combustion chamber of the thermal oxidizer was set at a value not to be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was in compliance.

Acceptable values for the temperature of the combustion chamber of the thermal oxidizer are those values that fall within the indicator range specified above

The indicator range noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the ranges above based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: 40 CFR Part 64 CAM and 3745-77-07(A)(1))

(3) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

Upon detecting an excursion of the thermal oxidizer temperature indicator range listed in d)(2), the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion.

(Authority for term: 40 CFR Part 64 CAM, 3745-21-09(B), and 3745-77-07(A)(1))

(4) Whenever the monitored values for the average temperature within the combustion chamber of the thermal oxidizer deviate from the indicator range specified in d)(2), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began and ended;

b. the magnitude of the deviation;

c. the date(s) the investigation was conducted;

d. the names of the personnel who conducted the investigation; and

e. the findings and recommendations of the investigation.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1))

(5) In response to each required investigation required in d)(4) to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the indicator range specified in d)(2). The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1))

(6) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1))

(7) The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the static pressure measured at the inlet plenum to the thermal oxidizer. The indicator range was set at a value such that the 3-hour average static pressure measured at the inlet plenum to the thermal oxidizer shall be maintained at a value at least 2.7 inches of water or at least 90% of the value recorded during the most recent emissions test that demonstrated the emissions unit(s) was in compliance.

Acceptable values for static pressure measured at the inlet plenum to the thermal oxidizer are those values that fall within the indicator range specified above.

The indicator range noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the ranges above based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1)]

(8) The permittee shall properly install, operate, and maintain equipment to monitor and record the static pressure at the inlet plenum to the thermal oxidizer while the emissions unit is in operation. Units shall be in inches of water. The monitoring and recording equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average static pressure

measured at the inlet plenum to the thermal oxidizer was less than the indicator range specified in d)(7); and

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring and recording equipment, and the associated emissions unit(s).

Upon detecting an excursion of the thermal oxidizer static pressure indicator range listed in d)(7), the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion.

[Authority for term: 40 CFR Part 64 CAM, 3745-31-05(A)(3), and 3745-77-07(A)(1)]

(9) Whenever the monitored values for the average static pressure measured at the inlet plenum to the thermal oxidizer deviate from the indicator range specified in d) (7), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began and ended;

b. the magnitude of the deviation;

c. the date(s) the investigation was conducted;

d. the names of the personnel who conducted the investigation; and

e. the findings and recommendations of the investigation.

[Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1)]

(10) In response to each required investigation required in d)(9) to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the indicator range specified in d)(7). The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1)]

(11) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the

results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

[Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1)]

(12) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-01399: d)(1)-d)(11). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit a quarterly deviation (excursion) report for any exceedance of the limitations specified in c)(1)-c)(4) above.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D) and 3745-77-07(A)(1))

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the thermal oxidizer during the operation of the emissions unit(s):

a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified in d)(2);

b. each period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;

c. an identification of each incident of deviation described in e)(2)a or e)(2)b (above) where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in e)(2)a or e)(2)b where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in e)(2)a or e)(2)b where proper records were not maintained for the investigation and/or the corrective action(s).

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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

(Authority for term: 40 CFR Part 64 CAM, 3745-21-09(B), and 3745-77-07(A)(1))

(3) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the thermal oxidizer during the operation of the emissions unit(s):

a. each period of time (start time and date, and end time and date) when the static pressure at the inlet plenum to the thermal oxidizer was outside of the range specified in d)(7);

b. each period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;

c. an identification of each incident of deviation described in e)(3)a or e)(3)b (above) where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in e)(3)a or e)(3)b where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the static pressure at the inlet plenum to the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in e)(3)a or e)(3)b where proper records were not maintained for the investigation and/or the corrective action(s).

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-01399: e)(1)-e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install

f) Testing Requirements

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

a. Emission Limitation

See c)(1)-c)(4) for coating and cleanup usage and VOC content restrictions.

Applicable Compliance Method

Compliance with the coating and cleanup usage and VOC content restrictions may be demonstrated by the information collected and recorded in d)(1).

b. Emission Limitation

5.70 lbs VOC/hour

Applicable Compliance Method

If required compliance with the hourly limit can be determined from the performance testing outlined in (f)(2).

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(A)(1))

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted within six-months of permit expiration.

The emission testing shall be conducted to demonstrate compliance with the capture and control requirements specified in b)(2) a.

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.).

The permittee shall record the temperature within the combustion chamber of the thermal oxidizer during each testing run. At a minimum the temperature shall be recorded at 15 minute intervals.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air

agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-01399: f)(1)-f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group - Band Lines (PTI 14-01339): K003, K004,

EU ID	Operations, Property and/or Equipment Description
K003	Band Line controlled by a thermal oxidizer
K004	Band Line controlled by a thermal oxidizer

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 3745-21-09(B)(6)	See b)(2)a.
b.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See d)(1)-d)(10), e)(1)-e)(2), and f)(1).

(2) Additional Terms and Conditions

a. This emissions unit shall be equipped with a capture system and associated control system which are designed and operated to achieve the following efficiencies for volatile organic compounds:

i. an overall reduction efficiency which is at least 81 percent, by weight; and

ii. a control efficiency which is at least 90 percent, by weight.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for monitoring the control efficiency for the thermal oxidizer controlling this emission is based on measuring the temperature within the combustion chamber of the thermal oxidizer. The indicator range for the temperature within the combustion chamber of the thermal oxidizer was set at a value not to be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was in compliance.

Acceptable values for the temperature of the combustion chamber of the thermal oxidizer are those values that fall within the indicator range specified above

The indicator range noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the ranges above based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1))

(2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

Upon detecting an excursion of the thermal oxidizer temperature indicator range listed in d)(2), the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion.

(Authority for term: 40 CFR Part 64 CAM, 3745-21-09(B), and 3745-77-07(A)(1))

(3) Whenever the monitored values for the average temperature within the combustion chamber of the thermal oxidizer deviate from the indicator range specified in d)(2), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began and ended;

b. the magnitude of the deviation;

c. the date(s) the investigation was conducted;

d. the names of the personnel who conducted the investigation; and

e. the findings and recommendations of the investigation.

(Authority for term: 40 CFR Part 64 CAM,and 3745-77-07(A)(1))

(4) In response to each required investigation required in d)(4) to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the indicator range specified in d)(2). The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1))

(5) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(6) The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the static pressure measured at the inlet plenum to the thermal oxidizer. The indicator range was set at a value such that the 3-hour average static pressure measured at the inlet plenum to the thermal oxidizer shall be maintained at a value at least 2.7 inches of water or at least 90% of the value recorded during the most recent emissions test that demonstrated the emissions unit(s) was in compliance.

Acceptable values for static pressure measured at the inlet plenum to the thermal oxidizer are those values that fall within the indicator range specified above.

The indicator range noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the ranges above based upon information obtained during future emission tests that demonstrate compliance with the control efficiency for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1)]

(7) The permittee shall properly install, operate, and maintain equipment to monitor and record the static pressure at the inlet plenum to the thermal oxidizer while the emissions unit is in operation. Units shall be in inches of water. The monitoring and recording equipment shall be installed, calibrated, operated, and maintained in accordance with

the manufacturer's recommendations, instructions, and the operating manuals. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average static pressure measured at the inlet plenum to the thermal oxidizer was less than the indicator range specified in d)(6); and

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring and recording equipment, and the associated emissions unit(s).

Upon detecting an excursion of the thermal oxidizer static pressure indicator range listed in d)(6), the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion.

[Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1)]

(8) Whenever the monitored values for the average static pressure measured at the inlet plenum to the thermal oxidizer deviate from the indicator range specified in d)(6), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began and ended;

b. the magnitude of the deviation;

c. the date(s) the investigation was conducted;

d. the names of the personnel who conducted the investigation; and

e. the findings and recommendations of the investigation.

[Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1)]

(9) In response to each required investigation required in d)(8) to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the indicator range specified in d)(6). The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date and time the corrective action was completed; and

c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

[Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1)]

(10) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

[Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the thermal oxidizer during the operation of the emissions unit(s):

a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified in d)(1);

b. each period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;

c. an identification of each incident of deviation described in e)(1)a or e)(1)b (above) where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in e)(1)a or e)(1)b where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in e)(1)a or e)(1)b where proper records were not maintained for the investigation and/or the corrective action(s).

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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

(Authority for term: 40 CFR Part 64 CAM, 3745-21-09(B), and 3745-77-07(A)(1))

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the thermal oxidizer during the operation of the emissions unit(s):

a. each period of time (start time and date, and end time and date) when the static pressure at the inlet plenum to the thermal oxidizer was outside of the range specified in d)(6);

b. each period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;

c. an identification of each incident of deviation described in e)(2)a or e)(2)b (above) where a prompt investigation was not conducted;

d. an identification of each incident of deviation described in e)(2)a or e)(2)b where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the static pressure at the inlet plenum to the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in e)(2)a or e)(2)b where proper records were not maintained for the investigation and/or the corrective action(s).

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1))

f) Testing Requirements

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

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted within six-months of permit expiration.

The emission testing shall be conducted to demonstrate compliance with the capture and control requirements specified in b)(2) a.

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The permittee shall record the temperature within the combustion chamber of the thermal oxidizer during each testing run. At a minimum the temperature shall be recorded at 15 minute intervals.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(A)(1))

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group - Coil Nail Coater: K281, K282,

EU ID	Operations, Property and/or Equipment Description
K281	Coil nail coat
K282	Coil nail coat

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 14-0707)	5.26 lbs of volatile organic compounds (VOC) minus water and exempt solvents. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(f)(ii).
b.	OAC rule 3745-21-09(U)(2)(f)(ii)	See b)(2)a.

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(2) Additional Terms and Conditions

a. The alternative limitation (5.26 lbs of VOC minus water and exempt solvents) established in PTI 14-0707 was determined to be the lowest emission limitation that the coating line is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

a. the name and identification number of each coating, as applied; and

b. the mass of VOC per volume of each coating, excluding water and exempt solvents, as applied, calculated as follows:

$C_{VOC,2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$

where:

D_C = the density of coating, in pounds of coating per gallon of coating.

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

V_S = volume fraction of solids in coating, in gallons of solids per gallon of coating.

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

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific "gallons/year" and/or "tons/year" limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-21-09(B)(3), 3745-21-10(B)(8), and 3745-77-07(A)(1))

e) Reporting Requirements

(1) 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 non-complying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-21-09(B)(3)(g), and 3745-77-07(A)(1))

f) Testing Requirements

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

a. Emission Limitation

5.26 lbs of VOC per gallon of coating excluding water and exempt solvents.

Applicable Compliance Method

If required, USEPA Methods 24 shall be used to determine the VOC content for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

(Authority for term: OAC rules 3745-21-10(B) and 3745-77-07(A)(1))

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group - Staple Machines: K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026, K027, K028, K029, K030, K031, K032, K033, K035, K036, K037, K038, K039, K040, K041, K042, K043, K044, K045, K046, K047, K048, K049, K050, K051, K052, K054, K055, K056, K057, K058, K059, K060, K061, K062, K063, K064, K065, K066, K067, K068, K069, K070, K071, K072, K073, K074, K075, K076, K077, K078, K079, K080, K081, K082, K083, K084, K085, K086, K087, K088, K089, K090, K091, K092, K093, K094, K095, K096, K097, K098, K099, K100, K101, K102, K103, K104, K105, K106, K107, K108, K109, K110, K130,

EU ID	Operations, Property and/or Equipment Description
K015	STAPLE MACHINE
K016	STAPLE MACHINE
K017	STAPLE MACHINE
K018	STAPLE MACHINE
K019	STAPLE MACHINE
K020	STAPLE MACHINE
K021	STAPLE MACHINE
K022	STAPLE MACHINE
K023	STAPLE MACHINE
K024	STAPLE MACHINE
K025	STAPLE MACHINE
K026	STAPLE MACHINE
K027	STAPLE MACHINE
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K031	STAPLE MACHINE
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K045	STAPLE MACHINE
K046	STAPLE MACHINE
K047	STAPLE MACHINE
K048	STAPLE MACHINE
K049	STAPLE MACHINE
K050	STAPLE MACHINE
K051	STAPLE MACHINE
K052	STAPLE MACHINE
K054	STAPLE MACHINE
K055	STAPLE MACHINE
K056	STAPLE MACHINE

EU ID	Operations, Property and/or Equipment Description
K057	STAPLE MACHINE
K058	STAPLE MACHINE
K059	STAPLE MACHINE
K060	STAPLE MACHINE
K061	STAPLE MACHINE
K062	STAPLE MACHINE
K063	STAPLE MACHINE
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K066	STAPLE MACHINE
K067	STAPLE MACHINE
K068	STAPLE MACHINE
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K078	STAPLE MACHINE
K079	STAPLE MACHINE
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K081	STAPLE MACHINE
K082	STAPLE MACHINE
K083	STAPLE MACHINE
K084	STAPLE MACHINE
K085	STAPLE MACHINE
K086	STAPLE MACHINE
K087	STAPLE MACHINE
K088	STAPLE MACHINE
K089	STAPLE MACHINE
K090	STAPLE MACHINE
K091	STAPLE MACHINE
K092	STAPLE MACHINE
K093	STAPLE MACHINE
K094	STAPLE MACHINE
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K096	STAPLE MACHINE
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K098	STAPLE MACHINE
K099	STAPLE MACHINE
K100	STAPLE MACHINE
K101	STAPLE MACHINE
K102	STAPLE MACHINE
K103	STAPLE MACHINE
K104	STAPLE MACHINE

EU ID	Operations, Property and/or Equipment Description
K105	STAPLE MACHINE
K106	STAPLE MACHINE
K107	STAPLE MACHINE
K108	STAPLE MACHINE
K109	STAPLE MACHINE
K110	STAPLE MACHINE
K130	STAPLE MACHINE

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 3745-21-09(U)(1)(c)	The volatile organic compound (VOC) content (as applied) of each coating employed in this emissions unit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

a. the name and identification number of each coating, as applied; and

b. the mass of VOC per volume of each coating, excluding water and exempt solvents, as applied, calculated as follows:

$C_{VOC,2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$

where:

D_C = the density of coating, in pounds of coating per gallon of coating.

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

V_S = volume fraction of solids in coating, in gallons of solids per gallon of coating.

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

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific "gallons/year" and/or "tons/year" limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

(Authority for term: OAC rules 3745-21-09(B)(3), OAC rule 3745-21-10(B)(8), and 3745-77-07(A)(1))

e) Reporting Requirements

(1) 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 non-complying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-21-09(B)(3)(g) and 3745-77-07(A)(1))

f) Testing Requirements

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

a. Emission Limitation

3.5 lbs of VOC per gallon of coating excluding water and exempt solvents.

Applicable Compliance Method

If required, USEPA Methods 24 shall be used to determine the VOC content for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

(Authority for term: OAC rules 3745-21-10(B) and 3745-77-07(A)(1))

g) Miscellaneous Requirements

(1) None.