Ohio Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

Certified Mail

8/10/2010

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Paul Zeiler
GUARDIAN MILLBURY CORP
24145 W MOLINE-MARTIN RD
MILLBURY, OH 43447

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0362000114
Permit Number: P0087403
Permit Type: Renewal
County: Ottawa

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-NWDO

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
GUARDIAN MILLBURY CORP

Facility ID: 0362000114
Permit Number: P0087403
Permit Type: Renewal
Issued: 8/10/2010
Effective: 8/10/2010
Expiration: 8/10/2020

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
GUARDIAN MILLBURY CORP

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Authorization

Facility ID: 0362000114
Application Number(s): A0018374
Permit Number: P0087403
Permit Description: Renewal PTIO for glass seaming process with baghouse, P005-P006 and silkscreen printer, dryer and tempering furnace, P008 and glass coating operation, P009.
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 8/10/2010
Effective Date: 8/10/2010
Expiration Date: 8/10/2020
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

GUARDIAN MILLBURY CORP
24145 W MOLINE-MARTIN RD
MILLBURY, OH 43447

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0087403
Permit Description: Renewal PTIO for glass seaming process with baghouse, P005-P006 and silkscreen printer, dryer and tempering furnace, P008 and glass coating operation, P009.

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

Emissions Unit ID:	**P005**
Company Equipment ID:	Glass Seaming Process w/ Baghouse
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P006**
Company Equipment ID:	Glass Seaming Process w/ Baghouse
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P007**
Company Equipment ID:	Glass cullet chrusher w/ baghouse
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P008**
Company Equipment ID:	Silkscreen Printing Machinew/drying oven,Tempering Furn
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P009**
Company Equipment ID:	Clear and Black Priming Assembly
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.
The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

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

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

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

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

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

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

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

this permit) even if you do not receive the renewal notice.
If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

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

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

7. What reports must I submit under this permit?

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

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

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).
The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.
If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.
You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.
Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. P005, Glass Seaming Process w/ Baghouse

Operations, Property and/or Equipment Description:

Glass Seaming Process w/Baghouse

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	0.20 lb particulate emissions (PE)/hr See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements for this emission unit have been determined to be the use of a baghouse and compliance with the terms and conditions of this permit.

b. This emission limitation established pursuant to this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. The color of the emissions;

b. Whether the emissions are representative of normal operations;

c. If the emissions are not representative of normal operations; the cause of the abnormal emissions;

d. The total duration of any visible emissions incident; and

e. Any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d)(1)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

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

(2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and

b. any corrective actions taken to eliminate the visible particulate emissions;

f) Testing Requirements

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

a. Emission Limitation:
0.20 lb PE/hr

Applicable Compliance Method:
Compliance with the lbs/hr emission limitation shall be determined by applying the minimum design control efficiency of 99% to the maximum uncontrolled emission rate of 17.4 lbs PE/hr multiplied by a safety factor of 1.2. If required, compliance with the hourly PE emissions rate shall be determined with stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:
Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method:
If required, compliance with the visible particulate emissions limitation above shall be determined in accordance with the methods and procedures in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.

2. P006, Glass Seaming Process w/ Baghouse

Operations, Property and/or Equipment Description:

Glass Seaming Process w/Baghouse

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	0.10 lb particulate emissions (PE)/hr See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements for this emission unit have been determined to be the use of a baghouse and compliance with the terms and conditions of this permit.

b. This emission limitation established pursuant to this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. The color of the emissions;

b. Whether the emissions are representative of normal operations;

c. If the emissions are not representative of normal operations; the cause of the abnormal emissions;

d. The total duration of any visible emissions incident; and

e. Any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d)(1)d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

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

(2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and

b. any corrective actions taken to eliminate the visible particulate emissions.

f) Testing Requirements

a. Emission Limitation:
0.10 lb PE/hr

Applicable Compliance Method:
Compliance with the lbs/hr emission limitation shall be determined by applying the minimum design control efficiency of 99% to the maximum uncontrolled emission rate of 8.72 lbs PE/hr multiplied by a safety factor of 1.2. If required, compliance with the hourly PE emissions rate shall be determined with stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:
Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method:
If required, compliance with the visible particulate emissions limitation above shall be determined in accordance with the methods and procedures in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.

3. P007, Glass cullet crusher w/ baghouse

Operations, Property and/or Equipment Description:

Glass cullet crusher and baghouse

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	0.20 lb particulate emissions (PE)/hr; 0.88 tons PE/yr See b)(2)a. Visible particulate emissions shall not exceed 0% opacity as a six-minute average
b.	OAC rule 3745-17-07(A)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) for this emissions unit has been determined to be the use of a baghouse with a minimum designed control efficiency of 99% and compliance with the terms and conditions of this permit.

b. This emission unit is exempt from the visible particulate emission limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h).

c. The uncontrolled mass rate of particulate emission from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. In addition, Table I does not apply since the facility is located in Ottawa county.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 3.5 inches of water.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, 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;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) 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.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

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

(2) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;

b. any 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 baghouse;

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

d. each incident of deviation described in e)(2)a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in e)(2)a. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

f) Testing Requirements

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

a. Emission Limitation:
0.20 lb PE/hr; 0.88 ton PE/yr

Applicable Compliance Method:
Compliance with the lbs/hr emission limitation shall be determined by applying the minimum design control efficiency of 99% to the maximum uncontrolled emission rate of 20 lbs PE/hr. If required, compliance with the hourly PE emissions rate shall be determined with stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly emission rate by 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, if compliance is shown with the daily emission limitation, compliance with the annual emission limitation shall also be demonstrated.

b. Emission Limitation:
Visible particulate emissions shall not exceed 0% opacity as a 6-minute average

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

4. P008, Silkscreen Printing Machine w/drying oven, Tempering Furnace

Operations, Property and/or Equipment Description:

Silkscreen printing machine with a drying oven and tempering furnace

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

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

a. g)(1).

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	2.46 lbs organic compounds (OC)/hr; 10.77 tons OC/yr from coating operations [See b)(2)a.] 5.60 lbs OC/month; 0.03 tons OC/yr from cleanup operations
b.	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day See b)(2)b. and b)(2)c.

(2) Additional Terms and Conditions

a. This emissions unit is subject to 2.46 lbs OC/hr from coating operations at all times except for when subject to OAC rule 3745-21-07(G)(2) as specified in section b)(2)b.

b. This emissions unit becomes subject to OAC rule 3745-21-07(G)(2) for each day when any photochemically reactive material is employed. On any such day, all emissions from both the application of photochemically reactive and non-photochemically reactive materials (coatings) is applicable to the requirement that OC emissions shall not exceed 8 lbs/hr and 40 lbs/day.

c. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

[b)(1)b., b)(2)b., c)(1), d)(1), d)(2), d)(3), d)(5)b., e)(2), e)(3) and f)(1)d.]

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

(2) On any day when any photochemically reactive material is employed, the permittee shall collect and record the following information for this emissions unit for such day;

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

b. The number of gallons of each coating applied;

c. The organic compound content of each coating, in lbs/gallon, as applied;

d. The total organic compound emission rate for all coatings applied; in lbs/day;

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

f. The average hourly organic compound emission rate [d)(2)d./d)(2)e.], in lbs/hr (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "non-photochemically reactive" are based upon OAC rule 3745-21-01.]

(3) On any day when only non-photochemically reactive materials are employed (for coatings), the permittee shall collect and record the following information for this emissions unit for such day:

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

b. The OC content of each coating, as applied, in lbs/gallon;

c. The number of gallons of each coating employed;

d. The OC emission rate for each coating employed, in lbs/month [i.e., d)(3)b. x d)(3)c.]; and

e. The total OC emission rate for all coating materials employed [i.e., the sum of d)(3)d.].

(4) In conjunction with the record keeping in d)(1), the permittee shall collect and record the following information for this emissions unit each month:

a. The number of gallons of each coating applied;

b. The OC content of each coating, as applied, in lbs/gallon;

c. The total OC emission rate from all coatings employed, in tons/month;

d. The total number of hours the emission unit was in operation

e. The organic compound content of each coating, in lbs/gallon, as applied;

f. The total organic compound emission rate for all coatings applied; in lbs/day; and

g. The annual year-to-date, OC emission from all coatings employed [i.e., the sum of d)(4)c. for each calendar month from January to December].

(5) The permittee shall collect and record the following each month for cleanup operations:

a. The name and identification of each cleanup material employed;

b. Documentation as to whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;

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

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

e. The OC emissions from each cleanup material employed [i.e., d)(5)c. x d)(5)d.];

f. The total OC emissions from all cleanup materials employed in lbs or tons; and

g. The annual year-to-date OC emissions from cleanup operations, in tons/yr [i.e., the summation of d)(5)f. for each calendar month to date from January to December].

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

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

e) Reporting Requirements

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

(2) The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:

a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emission as calculated by term and condition d)(2)f. exceed 8 lbs/hr.

b. For the days during which a photochemically reactive material was applied, an identification of each day during which the average hourly organic compound emissions was calculated by term and condition d)(2)d. exceed 40 lbs/day.

These reports shall be submitted in accordance with the general terms and conditions of this permit.

(3) The permittee shall notify the Ohio EPA Northwest District Office in writing of any monthly record showing the use of photochemically reactive material for cleanup operations in this emissions unit. The notification shall include a copy of such record and shall be sent to the NWDO within 30 days following the end of the calendar month.

f) Testing Requirements

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

a. <u>Emission Limitation</u>:
2.46 lbs OC/hr from coating operations

<u>Applicable Compliance Method</u>:
The hourly emission limitation represents the potential to emit (PTE)* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The PTE is based on a worst-case coating operation involving a maximum coating usage rate of 0.70 gallons per hour and a maximum OC content of 3.51 pounds per gallon.

b. Emission Limitation:
10.77 tons OC/yr from coating operations

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section d)(4) of this permit.

c. Emission Limitation:
5.60 lbs OC/month; 0.03 tons OC/yr from cleanup operations

Applicable Compliance Method:
Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section d)(5).

d. Emission Limitation:
OC emission shall not exceed 8 lbs/hr and 40 lbs/day

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section d)(2) of this permit.

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's annual emission for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires the permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain an new permit to install.

5. P009, Clear and Black Priming Assembly

Operations, Property and/or Equipment Description:

Clear and black priming assembly

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

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

a. g)(1)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	0.52 lb organic compound (OC)/hr; 2.28 tons OC/yr
b.	OAC rule 3745-21-07(G)(2)	See b)(2)b.

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) requirements for this emission unit have been determined to be compliance with the terms and conditions of this permit.

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. The company identification for each coating material employed;

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

c. The OC content in pounds per gallon, for each coating employed;

d. The OC emission rate for each coating employed, in lbs/month [i.e., the summation of d)(1)b. times d)(1)c.];

e. The total OC emission rate for all coating materials employed [i.e., the summation of d)(1)d.]; and

f. The annual, year-to-date, OC emissions from all coatings employed [i.e., the summation of d)(1)e. for each calendar month to date from January to December].

e) Reporting Requirements

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

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of this permit to install shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:
0.52 lbs OC/hr; 2.28 tons OC/yr

<u>Applicable Compliance Method</u>:
The hourly OC emission limitation is based on the emissions unit potential to emit (PTE)*. Therefore, no hourly record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance.

*The PTE for this emissions unit was based on the maximum OC contents of 6.94 lbs/gal and 4.82 lbs/gal for the clear and black primer, respectively and maximum hourly usage rates of 0.03125 gal/hr and 0.0625 gal/hr for the clear and black primer, respectively.

Compliance with the tons OC/yr shall be based upon the record keeping requirements specified in section d)(1) of this permit.

g) Miscellaneous Requirements

(1) Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1 ton. OAC Chapter 3745-31 requires the permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.