Ohio Environmental Protection Agency

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

8/23/2010

Certified Mail

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

David McCleery
Spectrum Metal Finishing, Inc.
535 Bev Road
Youngstown, OH 44512-6490

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0250110100
Permit Number: P0106134
Permit Type: Initial Installation
County: Mahoning

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains 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 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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. This permit can be accessed electronically on the Division of Air Pollution Control (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: U.S. EPA
Ohio EPA-NEDO; Pennsylvania; West Virginia

Response to Comments

Response to comments for: Permit-To-Install

Facility ID:	0250110100
Facility Name:	Spectrum Metal Finishing, Inc.
Facility Description:	coated metal extrusions
Facility Address:	535 Bev Road Youngstown, OH 44512-6490 Mahoning County
Permit #:	P0106134, Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Youngstown-Vindicator on 07/17/2010. The comment period ended on 08/16/2010.	
Hearing date (if held)	None
Hearing Public Notice Date (if different from draft public notice)	None

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: **None**
    a. Comment: **None**
    b. Response: **None**

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Spectrum Metal Finishing, Inc.

Facility ID:	0250110100
Permit Number:	P0106134
Permit Type:	Initial Installation
Issued:	8/23/2010
Effective:	8/23/2010

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Spectrum Metal Finishing, Inc.

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 7
9. Reporting Requirements 7
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 9
14. Public Disclosure 10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 10
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 13
1. K002, Liquid Coating Line 14

Authorization

Facility ID: 0250110100
Facility Description: Coated metal extrusions
Application Number(s): A0038564
Permit Number: P0106134
Permit Description: Coating line with permanent enclosure and incinerator
Permit Type: Initial Installation
Permit Fee: $400.00
Issue Date: 8/23/2010
Effective Date: 8/23/2010

This document constitutes issuance to:

Spectrum Metal Finishing, Inc.
535 Bev Road
Youngstown, OH 44512-6490

of a Permit-to-Install 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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0106134
Permit Description: Coating line with permanent enclosure and incinerator

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

Emissions Unit ID:	**K002**
Company Equipment ID:	Liquid Coating Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

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.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) 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.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.

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, revoked, or revoked and reissued, for cause. 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 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.

4. 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, 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.

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, 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.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written 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. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. 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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.

c) 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 ORC section 3704.08.

(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.

d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

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 quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

19. 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.

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 emissions unit contained in this permit is subject to 40 CFR Part 63, Subpart MMMM: K002. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Ohio EPA Northeast District Office.

C. Emissions Unit Terms and Conditions

1. K002, Liquid Coating Line

Operations, Property and/or Equipment Description:

Liquid coating line consisting of the following: 2 automatic electrostatic primer booths, 2 manual electrostatic topcoat booths, 2 automatic electrostatic topcoat booths, 2 automatic electrostatic clearcoat booths, and a 5 mmBtu/hr 2-zone bake oven.

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) (BAT until installation of the regenerative thermal oxidizer)	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 182.40 lbs/hr, including coating and cleanup. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U). See b)(2)a.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD/NSR until installation of the regenerative thermal oxidizer)	VOC from this emissions unit shall not exceed 249 tons per year, including coating and cleanup, based upon a rolling, 12-month summation. See b)(2)f.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate Emissions (PE) from this emissions unit shall not exceed 3.65 pounds per hour and 15.99 tons per year. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and OAC rule 3745-17-11(B) and (C). See b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(E), as effective 12/01/06	See b)(2)c.
e.	OAC rule 3745-21-09(U)(1)(c) (rule applies until installation of the regenerative thermal oxidizer)	See b)(2)d.
f.	OAC rule 3745-21-09(U)(1)(h) (rule applies until installation of the regenerative thermal oxidizer)	See b)(2)e.
g.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (BAT after installation of the regenerative thermal oxidizer)	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 3.65 lbs/hr and 15.99 tons per year, including coating and cleanup. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(B). See b)(2)a, b)(2)h, b)(2)i, b)(2)m, b)(2)n and b)(2)o.
h.	OAC rule 3745-21-09(B)(6) (rule applies after installation of the regenerative thermal oxidizer)	The requirements established pursuant to this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).
i.	OAC rule 3745-17-11(B)(1)	The requirements established pursuant to this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).
j.	OAC rule 3745-17-11(C)	See b)(2)g.
k.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
l.	40 CFR Part 63, Subpart MMMM	The organic hazardous air pollutant (HAP) emissions from the existing general use coatings operations shall not exceed: 0.31 kg/liter of coating solids used during each rolling, 12-month period; or 2.6 lbs/gal of coating solids used during each rolling, 12-month period. The organic HAP emissions from the existing high performance coatings operations shall not exceed:

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		3.3 kg/liter of coating solids used during each rolling, 12-month period; or 27.5 lbs/gal of coating solids used during each rolling, 12-month period. See b)(2)k and b)(2)l.
m.	40 CFR Part 63, Subpart A (63.1 through 63.15)	Table 2 to Subpart MMMM of 40 CFR Part 63 – Applicability of General Provisions to Subpart MMMM shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.15 apply.
n.	40 CFR Part 64, Compliance Assurance Monitoring (CAM)	See b)(2)j.

(2) Additional Terms and Conditions

a. Per the Consent Order filed on February 19, 2010, the permittee shall install and begin operation of the control equipment with all necessary capture equipment within 230 days from the date of issuance of this permit. The above-listed "BAT until installation of the regenerative thermal oxidizer" shall apply until the control and capture equipment is installed and operational. The above-listed "BAT after installation of the regenerative thermal oxidizer" shall apply after the control and capture equipment is installed and operational. The control and capture equipment shall be considered operational for purposes of this permit the first time it is brought online or 230 days from the date of issuance of this permit, whichever comes first.

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

[OAC rule 3745-31-05(A)(3), as effective 11/30/01]

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Permit to Install P0106134 for this air contaminant source takes into account the following voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. Use of a dry filtration system for the control of particulate emissions, with a control efficiency of 95%.

ii. After installation of the incinerator, the VOC capture and control equipment shall provide not less than a 98% reduction, by weight, in overall VOC emissions from line K002, and the control equipment (thermal incinerator) shall provide an efficiency (percent destruction) of not less than 98%, by weight, for VOC emissions vented to the control equipment.

[OAC rule 3745-31-05(E), as effective 12/01/06]

d. The VOC content shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvent(s), as a daily volume-weighted average, for extreme performance coatings.

e. The VOC content shall not exceed 6.2 pounds of VOC per gallon of coating, excluding water and exempt solvent(s), as a daily volume-weighted average, for high performance architectural aluminum coatings.

f. The maximum annual volatile organic material usage (from coatings and cleanup) for K002 shall not exceed 249 tons, based upon a rolling, 12-month summation of the volatile organic material figures as calculated from the following equation:

$\sum_{i=1}^{n}\left(x_i\, y_i\right) / \, 2{,}000$ lbs/ton

where:

x_i = the amount of coating or clean up material (in gallons);

y_i = the VOC content of coating or clean up material " i ", as pounds per gallon; and

i = subscript denoting a specific coating or cleanup material.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the volatile organic material usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Volatile Organic Material Usage for K002
1	20.75 tons
1-2	41.5 tons
1-3	62.25 tons
1-4	83 tons
1-5	103.75 tons
1-6	124.5 tons
1-7	145.25 tons
1-8	166 tons
1-9	186.75 tons
1-10	207.5 tons
1-11	228.25 tons
1-12	249 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual volatile organic material usage limitation shall be based upon a rolling, 12-month summation of the volatile organic material usage figures.

g. 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.

h. In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee shall comply with the provisions of OAC rule 3745-31-05(A)(3) and shall operate and maintain a thermal incinerator capable of capturing and controlling VOC emissions from line K002.

The VOC capture and control equipment shall provide not less than an 98% reduction, by weight, in overall VOC emissions from line K002, and the control

equipment (thermal incinerator) shall provide an efficiency (percent destruction) of not less than 98%, by weight, for VOC emissions vented to the control equipment.

i. All of the VOC emissions from this emissions unit shall be vented to a thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

j. Pursuant to 40 CFR 64.5(a) of the Compliance Assurance Monitoring (CAM) requirements, the information required under 40 CFR 64.4 shall be submitted as part of the application for an initial part 70 or 71 permit.

k. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

The final rules found in 40 CFR Part 63, Subpart MMMM establish national emission standards for HAPs, work practice standards, operating limitations, and compliance requirements for miscellaneous metal parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of miscellaneous metal parts and products:

i. all coating operations as defined in 40 CFR 63.3981;

ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

l. The permittee shall comply with the applicable limits required under 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3890(c)(1)	Predominant activity requirements
63.3890(c)(2)	Facility-specific emission limit requirements
63.3891(a)	Compliant material option
63.3891(b)	Emission rate without add-on controls option
63.3891(c)	Emission rate with add-on controls option
63.3892(a)	When using compliant material option or emission rate without add-on controls option, operating limits are not

	applicable
63.3892(b)	When using emission rate with add-on controls option, the operating limits established in Table 1 and during the performance test apply
63.3892(c)	Approval of alternative monitoring or operating limit

m. A permanent total enclosure shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device, such that all VOC emissions are captured, contained and directed to the control device.

n. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

i. Any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point. An equivalent diameter is the diameter of a circle that has the same area as the opening. If the opening is not circular the equivalent diameter (ED) is calculated as follows:

$$ED = (4\ area/\pi)^{0.5}$$

ii. The total area of all natural draft openings (A_N) shall not exceed 5 percent of the total surface area of the enclosure (A_T), i.e, the four walls, floor, and ceiling. The natural draft opening to enclosure area ratio (NEAR) is calculated as follows:

$$NEAR = A_N / A_T$$

iii. The direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) and a pressure drop of 0.013 mm Hg (0.007 in. H2O).

iv. All access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination described above,

shall be completely closed to any air movement during process operations.

v. All VOC emissions shall be captured and contained for discharge through the control device.

o. The permanent total enclosure serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions from this emissions unit.

c) Operational Restrictions

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature in the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) in any 3-hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance, and as recommended by the manufacturer until testing.

(2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

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

63.3893(a)	When using compliant material option or emission rate without add-on controls option, work practice standards are not applicable
63.3893(b)	When using emission rate with add-on controls option, develop and implement a work practice plan as specified in (b)(1) through (b)(5).
63.3900(a)(1)	When using compliant material option or emission rate without add-on controls option, coating operation must be in compliance at all times
63.3900(a)(2)	When using emission rate with add-on controls option, exception for periods of startup, shutdown and malfunction
63.3900(b)	Operate according to 63.6(e)(1)(i).

63.3900(c)	If using emission capture system and add-on control device, a written startup, shutdown, and malfunction plan is required
63.3950	Compliance date for emission rate without add-on controls option
63.3960(a), (b), (c)	Compliance dates for emission rate with add-on controls option
63.3963(g)	Startup, shutdown, malfunction plan must be followed
63.3967(a)	Establishing operating limits for thermal oxidizers
63.3967(f)	Establishing operating limits for emission capture systems

(5) The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 in. H_2O), whenever the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) 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, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within $\pm$ 1 percent of the temperature being measured or $\pm$ 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, with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance. Following compliance testing, 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 was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained during the performance test that demonstrated compliance, or below the temperature recommended by the manufacturer until performance testing is completed; 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).

These records shall be maintained at the facility for a period of three years.

(2) The permittee shall collect and record the following information on a daily basis for each coating applied in this emissions unit, until installation of the regenerative thermal oxidizer:

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

b. the VOC content (excluding water and exempt solvents) of each coating, as applied, in pounds per gallon;

c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;

d. the daily VOC emissions from all the coatings applied, in pounds (i.e., the summation of the products of “b” x “c”);

e. the daily volume-weighted average VOC content of all the coatings used as extreme performance coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

f. the daily volume-weighted average VOC content of all the coatings used as high performance architectural aluminum coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

g. the name and identification of each cleanup material, as applied;

h. the VOC content (excluding water and exempt solvents) of each cleanup material, as applied, in pounds per gallon;

i. the number of gallons (excluding water and exempt solvents) of each cleanup material, as applied;

j. the total VOC emissions from all cleanup materials, as applied, in pounds (i.e., the summation of the products of “h” times “i”);

k. the total VOC emissions from all coatings and cleanup materials, as applied, in pounds (i.e., the summation of “d” and “j”);

l. the total number of hours this emissions unit was in operation; and

m. the average hourly VOC emissions from all coatings and cleanup materials, as applied, in pounds (i.e., the quotient of “k” divided by “l”).

(3) The permittee shall collect and record the following information on a daily basis for each coating and cleanup material applied in this emissions unit, after installation of the regenerative thermal oxidizer:

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

b. the VOC content (excluding water and exempt solvents) of each coating, as applied, in pounds per gallon;

c. the number of gallons of each coating (excluding water and exempt solvents), as applied;

d. the overall control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance;

e. the daily controlled VOC emissions from all coatings applied, in pounds (i.e., the summation of the products of “b” times “c” times “d”);

f. the name and identification of each cleanup material, as applied;

g. the VOC content (excluding water and exempt solvents) of each cleanup material, in pounds per gallon;

h. the number of gallons (excluding water and exempt solvents) of each cleanup material, as applied;

i. the total controlled VOC emissions from all cleanup materials, as applied, in pounds (i.e., the summation of the products of “g” times “h” times “d”);

j. the total VOC emissions from all coatings and cleanup materials, as applied, in pounds (i.e., the summation of “e” and “i”);

k. the total number of hours this emissions unit was in operation; and

l. the average hourly controlled VOC emissions from all coatings and cleanup materials, as applied, in pounds (i.e., the quotient of “j” divided by “k”);

(4) Until installation of the regenerative thermal oxidizer, the permittee shall collect and record for each month for the coating line a summation of the daily VOC emissions, and the rolling, 12-month summation of monthly VOC emissions.

(5) 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(s) 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 emission incident; and

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

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission

incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission 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.

(6) 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 Ohio EPA Northeast District Office upon request.

(7) 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 Northeast District Office upon request.

(8) 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.

(9) 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 Ohio EPA Northeast District Office upon request.

(10) 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 Northeast District Office upon request.

(11) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit 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/limit 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:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

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

e. the temperature readings immediately after the corrective action was implemented; and

f. 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.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit 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.

(12) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3930(a)	Keep a copy of each notification and report submitted
63.3930(b)	Keep a current copy of information from materials suppliers or manufacturers
63.3930(c)(1)	Records of compliance options used for each compliance period
63.3930(d), (e), (f), (g), (h), (j)	Required overall records that should be maintained
63.3931(a), (b), (c)	Form and duration of record maintenance

(13) For the emission rate without add-on controls option, the permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3930(c)(3)	Records of HAP calculations
63.3951(a)	Determine the mass fraction of organic HAP for each material
63.3951(b)	Determine the volume fraction of coating solids
63.3951(c)	Determine the density of each material
63.3951(d)	Determine the volume of each material used
63.3951(e)	Calculate the mass of organic HAP emissions
63.3951(f)	Calculate the total volume of coating solids used
63.3951(g)	Calculate the organic HAP emission rate
63.3951(h)	Compliance demonstration
63.3952(a)	Demonstration of continuous compliance
63.3952(d)	Maintain records as specified in 63.3930 and 63.3931

(14) For the emission rate with add-on controls option, the permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3930(c)(4)	Records of HAP calculations
63.3930(k)	Records related to control device operation

63.3961(b)	Compliance with operating limits
63.3961(c)	Compliance with work practice requirements
63.3961(d)	Compliance with emission limits
63.3961(e)	Determine the mass fraction of organic HAP, density, volume used, and volume fraction of coating solids
63.3961(f)	Calculate the total mass of organic HAP emissions before add-on controls
63.3961(g)	Calculate the organic HAP emission reduction for each controlled coating operation
63.3961(h)	Calculate the organic HAP emission reduction for each controlled coating operation not using liquid-liquid material balance
63.3961(j)	Calculate the organic HAP emission reduction for each controlled coating operation using liquid-liquid material balances
63.3961(k)	Calculate the total volume of coating solids used
63.3961(l)	Calculate the mass of organic HAP emissions for each month
63.3961(m)	Calculate the organic HAP emission rate for the compliance period
63.3961(n)	Compliance demonstration
63.3963(a)	Continuous compliance demonstration
63.3963(j)	Maintain records as specified in 63.3930 and 63.3931
63.3968(a)	General requirements for continuous parameter monitoring systems
63.3968(b)	Capture system bypass line monitoring requirements
63.3968(c)	Thermal oxidizer monitoring requirements
63.3968(g)	Emission capture systems monitoring requirements

(15) The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):

a. the measured diameter of each natural draft opening;

b. the distance measured from each natural draft opening to each VOC emitting point;

c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor and ceiling;

d. the calculation or demonstration that the distance from each VOC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and

e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor and ceiling.

(16) The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitor and record the differential pressure between the inside and outside of the permanent total enclosure when the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

a. all 3-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or above the minimum pressure differential of 0.013 mm Hg (0.007 inch of water), as a 3-hour average; and

b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.

e) Reporting Requirements

(1) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content(s) exceed(s) the applicable limitation(s). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

(2) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the event occurs.

(3) The permittee shall submit quarterly deviation (excursion) reports, until installation of the regenerative thermal oxidizer, that identify the following:

a. an identification of each day where the average hourly VOC emission rate exceeded 182.40 pounds of VOC per hour.

(4) The permittee shall submit quarterly deviation (excursion) reports, after installation of the regenerative thermal oxidizer, that identify the following:

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 by the manufacturer and/or 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 thermal oxidizer;

c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” or “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;

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

f. an identification of each day where the average hourly VOC emission rate exceeded 3.65 pounds of VOC per hour;

g. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation;

h. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s); and

i. all 3-hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.013 mm Hg (0.007 inch of water).

(5) These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarter.

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

(6) Until installation of the regenerative thermal oxidizer, the permittee shall submit annual reports to the Ohio EPA Northeast District Office that summarize the VOC emissions. The report content shall include:

a. monthly VOC emissions; and

b. the rolling, 12-month summation of monthly VOC emissions for each month.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

(7) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

(8) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

(9) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3910(a)	Submit the notifications in 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply
63.3910(b)	Initial notification
63.3910(c)	Notification of compliance status
63.3920(a)	Semiannual compliance reports
63.3920(b)	Performance test reports
63.3920(c)	Startup, shutdown, malfunction reports
63.3952(b)	For emission rate without add-on controls option, deviations from emission limitations must be reported
63.3952(c)	For emission rate without add-on controls option, semiannual compliance report requirements
63.3963(b), (c)	Deviations from emission limitations must be reported
63.3963(d)	Bypass line deviation reporting
63.3963(e)	Work practice standard deviation reporting
63.3963(f)	Semiannual compliance report requirements

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions from this emissions unit shall not exceed 182.40 lbs/hr, including coating and cleanup (until installation of the regenerative thermal oxidizer).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)m.

b. Emission Limitation:

VOC from this emissions unit shall not exceed 249 tons per year, including coating and cleanup, based upon a rolling, 12-month summation (until installation of the regenerative thermal oxidizer).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(4).

c. Emission Limitation:

The VOC content shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvent(s), as a daily volume-weighted average, for extreme performance coatings (until installation of the regenerative thermal oxidizer).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)e.

d. Emission Limitation:

The VOC content shall not exceed 6.2 pounds of VOC per gallon of coating, excluding water and exempt solvent(s), as a daily volume-weighted average, for high performance architectural aluminum coatings (until installation of the regenerative thermal oxidizer).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)f.

e. Emission Limitation:

VOC emissions from this emissions unit shall not exceed 3.65 lbs/hr, including coating and cleanup (after installation of the regenerative thermal oxidizer).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3)l.

f. Emission Limitation:

VOC emissions from this emissions unit shall not exceed 15.99 tons per year, including coating and cleanup (after installation of the regenerative thermal oxidizer).

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable VOC emission limitation (3.65 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

PE from this emissions unit shall not exceed 3.65 pounds per hour.

Applicable Compliance Method:

To determine the worst case hourly particulate emission rate, the following equation may be used:

E = maximum coating solids usage (in pounds per hour) x (1 - TE) x (1 - CE)

where:

E = particulate emissions rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.60); and

CE = fractional control efficiency of the control equipment (0.95).

If required, compliance shall be demonstrated based upon performing emission tests in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

h. Emission Limitation:

PE from this emissions unit shall not exceed 15.99 tons per year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (3.65 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

i. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

j. Emission Limitation:

The VOC capture and control equipment shall provide not less than an 98% reduction, by weight, in overall VOC emissions from line K002, and the control equipment (thermal incinerator) shall provide an efficiency (percent destruction) of not less than 98%, by weight, for VOC emissions vented to the control equipment.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in f)(3).

k. Emission Limitations:

The organic HAP emissions from the existing general use coatings operations shall not exceed 0.31 kg/liter of coating solids used during each rolling, 12-month period or 2.6 lbs/gal of coating solids used during each rolling, 12-month period.

The organic HAP emissions from the existing high performance coatings operations shall not exceed 3.3 kg/liter of coating solids used during each rolling, 12-month period or 27.5 lbs/gal of coating solids used during each rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in d)(13) and d(14).

(2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

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

a. The emission testing shall be conducted no later than 180 days after the date of initial startup of the control device (thermal oxidizer with permanent total enclosure).

b. The emission testing shall be conducted in order to determine the VOC mass emission rate, the capture efficiency of the emission capture system vented to the thermal oxidizer and the destruction efficiency of the thermal oxidizer, both in percent.

c. The following test methods shall be employed to demonstrate compliance with the allowable VOC mass emission rate, the capture efficiency of the emission capture system vented to the thermal oxidizer and the destruction efficiency of the thermal oxidizer:

Method 1 or 1A of Appendix A to 40 CFR Part 60, as appropriate, to select sampling sites and velocity traverse points;

Method 2, 2A, 2C, 2D, 2F or 2G of Appendix A to 40 CFR Part 60, as appropriate, to measure gas volumetric flow rate;

Method 3, 3A, or 3B of Appendix A to 40 CFR Part 60, as appropriate, for gas analysis to determine dry molecular weight;

Method 4 of Appendix A to 40 CFR Part 60, to determine stack gas moisture;

Method 25 or 25A, to determine the total gaseous organic mass emissions as carbon at the inlet and outlet of the thermal oxidizer, simultaneously, using:

Method 25 if testing an oxidizer with expected carbon concentrations to exceed 50 ppm; or

Method 25A if testing an oxidizer with expected carbon concentrations to be 50 ppm or less, or if the control is not an oxidizer; and

Method 204 A through 204F (appropriate method) of Appendix M to 40 CFR Part 51 to determine the capture efficiency.

d. 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 Ohio EPA Northeast District Office.

e. The total gaseous organic emissions mass flow rates shall be determined at the inlet and the outlet of the thermal oxidizer for each of the 3 test runs.

f. The combustion temperature, defined as the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs, must be monitored and recorded at least once every 15 minutes during each of the 3 test runs. The average combustion temperature calculated from this data is the minimum operating limit for the thermal oxidizer.

g. During the compliance demonstration for the permanent total enclosure, monitoring devices shall be installed to measure the average facial velocity of the air flow through each natural draft opening.

h. Method 2 from 40 CFR Part 60, Appendix A shall be conducted to determine the volumetric flow rate of the exhaust stream(s) exiting the permanent total enclosure, corrected to standard conditions. If the building is being used as the permanent total enclosure, it may be necessary to measure the volumetric flow, corrected to standard conditions, of each gas stream entering the "enclosure" through a forced makeup air duct, using Method 2. The facial velocity (FV) shall be calculated using the following equation:

$FV = (Q_o - Q_i) / A_n$

where:

Q_o is the sum of the volumetric flow from all gas streams exiting the enclosure through an exhaust duct or hood;

Q_i is the sum of the volumetric flow from all gas streams into the enclosure through a forced makeup air duct, and is equal to zero if there is no forced makeup air into the enclosure; and

A_n is the total area of all natural draft openings in the enclosure.

i. If the average facial velocity is measured at greater than 500 feet per minute (9,000 m/hr), the direction of air flow shall be assumed to be inward at all times during the compliance demonstration. If the average facial velocity is measured at less than 500 feet per minute, the continuous inward flow of air shall be

verified at least once every 10 minutes for a minimum of 1 hour during the compliance demonstration, either by checking the flow or pressure meter(s) or through the use of streamers, smoke tubes, or tracer gases. All closed access doors and windows that are not considered natural draft openings shall also be checked once during the compliance demonstration for leakage around their perimeters using smoke tubes or tracer gases.

j. The permittee shall also measure and record the following information for the permanent total enclosure and each natural draft opening:

i. the diameter of each natural draft opening;

ii. the distance measured from each natural draft opening to each VOC emitting point in the process;

iii. the distance measured from each exhaust duct or hood in the enclosure to each natural draft opening;

iv. the total surface area of each natural draft opening and the surface area of the enclosure's four walls, floor and ceiling; and

v. the ratio of the total surface area (sum) of all natural draft openings to the total surface area of the permanent total enclosure.

k. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Northeast District Office's refusal to accept the results of the emission test(s).

l. Personnel from the Ohio EPA Northeast District Office 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.

m. 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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

(4) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3964(a)	Conduct each performance test according to requirements in 63.7(e)(1) and under representative conditions
63.3964(b)	Conduct each performance test of an emission capture system per 63.3965, and each add-on control device per 63.3966
63.3965(a)	Assuming 100 percent capture efficiency
63.3965(b)	Measuring capture efficiency
63.3965(c)	Liquid-to-uncaptured-gas protocol using a temporary total enclosure or building enclosure
63.3965(d)	Gas-to-gas protocol using a temporary total enclosure or a building enclosure
63.3965(e)	Alternative capture efficiency protocol
63.3966	Determining add-on control device emission reduction or removal efficiency
63.3967(a)	Establishing operating limits for thermal oxidizers
63.3967(f)	Establishing operating limits for emission capture systems

g) Miscellaneous Requirements

(1) None.