Ohio Environmental Protection Agency

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

9/7/2010

Certified Mail

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

Allen Wheeler
Jay Plastics, Inc.
150 East Longview Avenue
Mansfield, OH 44903-4206

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTA
Facility ID: 0370010058
Permit Number: P0106239
Permit Type: Initial Installation
County: Richland

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Mansfield News-Journal. A copy of the public notice and the draft permit are enclosed. 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. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NWDO; Canada

Permit Strategy Write-Up

1. Check all that apply:

   X Synthetic Minor Determination

   ___ Netting Determination

2. Source Description:

   Jay Plastics Inc, is a plastics fabrication facility located in Mansfield, Ohio. The company has proposed to add an additional Top Coat Booth to increase the flexibility of current coating operations.

3. Facility Emissions and Attainment Status:

   Jay Plastics is located in Richland County and is classified as a "major source" Title V permitting requirements but is not classified as a "major stationary source" for Prevention of Significant Deterioration (PSD) purposes because the existing coating lines have federally enforceable restrictions in place which limit the potential emissions to 230 tons per year of organic compounds (OC). In addition, the facility is not considered a "major source" for MACT permitting requirements as the existing coating lines also have federally enforceable restrictions in place which limit the potential emissions to 9.90 tons per year for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per year for any combination of HAPs. Richland County is designated attainment for all criteria pollutants.

4. Source Emissions:

   Jay Plastics Inc, has proposed to include the new Top Coat Booth into the facility's current federally enforceable restriction of 230 tons per year for OC. For purposes of federal enforceability a restriction on OC effective restricts volatile organic compounds

5. Conclusion:

   As part of the company's strategy to maintain its status as "non- major" for MACT and PSD permitting applicability, this PTI will incorporate federally enforceable permit conditions to include this emission unit into the facilities current restrictions. Therefore, there will be no change in the status of this facility.

6. Please provide additional notes or comments as necessary: None

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

Pollutant	Tons Per Year
OC	230.0
Individual HAP	9.9
Combined HAPs	24.9

Richland County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Jay Plastics, Inc.

Issue Date: 9/7/2010
Permit Number: P0106239
Permit Type: Initial Installation
Permit Description: Installation of a new Top Coat Booth
Facility ID: 0370010058
Facility Location: Jay Plastics, Inc.
150 East Longview Avenue,
Mansfield, OH 44903-4206
Facility Description: All Other Plastics Product Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 or (419)352-8461. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install
for
Jay Plastics, Inc.

Facility ID:	0370010058
Permit Number:	P0106239
Permit Type:	Initial Installation
Issued:	9/7/2010
Effective:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Jay Plastics, Inc.

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Authorization

Facility ID: 0370010058
Facility Description: Miscellaneous plastic parts coating operations.
Application Number(s): A0039386
Permit Number: P0106239
Permit Description: Installation of a new Top Coat Booth
Permit Type: Initial Installation
Permit Fee: $200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 9/7/2010
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Jay Plastics, Inc.
150 East Longview Avenue
Mansfield, OH 44903-4206

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

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: P0106239
Permit Description: Installation of a new Top Coat Booth

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

Emissions Unit ID:	**R015**
Company Equipment ID:	Ebrite Topcoat
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, Northwest 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, Northwest 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, Northwest 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, Northwest 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, Northwest 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, Northwest 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, Northwest 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 <u>obtained before</u> 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.

C. Emissions Unit Terms and Conditions

1. R015, Ebrite Topcoat

Operations, Property and/or Equipment Description:

Top Coat Booth

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) b)(1)d., b)(2)d., c)(3), d)(4), d)(5), d)(6), and d)(7)

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.	ORC 3704.03(T)	9.10 lbs organic compounds (OC)/hr, from coating operations The OC content of any cleanup material employed shall not exceed 7.34 lbs OC/gallon. See b)(2)a.
b.	OAC rule 3745-31-05(D)	230.0 tons of OC per rolling, 12-month period from the coatings and cleanup materials employed in emissions units R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, R013, R014, R015, R101, R102, R103, R105, R108, R109, R110, R111 and R112, combined (See b)(2)e.) 9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emissions units R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, R013, R014, R015, R101, R102, R103, R105, R108, R109, R110, R111 and R112 combined] (See b)(2)e.)
c.	OAC rule 3745-21-07(G)	None, [see c)(2)]

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)b.
d.	OAC rule 3745-17-11(C)	See b)(2)c.
e.	OAC rule 3745-17-11(B)(1)(a)	0.551 lb of particulate emissions (PE)/hour See b)(2)d.
f.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a six-minute average except as provided by rule. See b)(2)e.
g.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(7)

(2) Additional Terms and Conditions

a. The BAT requirements of ORC 3704.03(T) have been determined to be the establishment of emission limitations in section b)(1)a.

*The hourly emission limitation of 9.10 lbs OC/hr from the coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

b. 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: c)(2), d)(1), and e)(2).

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions, monitoring, recordkeeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio SIP. The following terms shall become federally enforceable after U.S. EPA approves the rule revision: none.

c. 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, recordkeeping, 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.

d. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.

e. This permit establishes the following federally enforceable emission limitations for purposes of avoiding the applicability of Maximum Achievable Control Technology (MACT) regulations and maintains the facility as a minor source for attainment New Source Review:

230.0 tons of OC per rolling, 12-month period from the coating and cleanup operations [for emissions units R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, R013, R014, R015, R101, R102, R103, R105, R108, R109, R110, R111 and R112 , combined] based on a coating/cleanup usage restriction [See c)(1)]. For purposes of federally enforceability an emission limitation on OC effectively limits emissions of volatile organic compounds (VOC).

Annual HAP emissions from emissions units R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, R013, R014, R015, R101, R102, R103, R105, R108, R109, R110, R111 and R112 , combined, shall not exceed 9.90 tons per rolling, 12-month period for any individual HAP or 24.90 tons per rolling, 12-month period for any combination of HAPs. Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

Rolling emission limitations were established in Permit to Install (PTI) #03-17403 issued on 06/12/08 and, as such, rolling emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of coatings and cleanup materials employed in emissions units R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, R013, R014, R101, R102, R103, R105, R018, R109, R110, R111 and R112 , combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^{n} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 230.0$$

where,

M = the increment of the rolling 12-month period;

V_i = OC content in pounds per gallon of each coating/cleanup employed;

G_i = Gallons used of each coating and cleanup material for the rolling 12 month period

n = total number of unique coatings and cleanup materials employed in emissions units R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, R013, R014, R101, R102, R103, R105, R018, R109, R110, R111 and R112

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

(3) 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.

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 procedures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in this emissions unit:

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

b. documentation of whether or not each coating and cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01.

(2) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, R013, R014, R015, R101, R102, R103, R105, R018, R109, R110, R111 and R112 , combined:

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

b. the OC content of each coating and cleanup material employed, in pounds per gallon, as applied;

c. the volume, in gallons, of each coating and cleanup material employed;

d. the OC emission rate for each coating and cleanup material employed (b times c), in pounds.

e. the cumulative monthly OC emission rate for all coatings and cleanup materials employed (summation of d), in tons; and

f. the rolling, 12-month OC emissions, for all coatings and cleanup materials, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

(3) The permittee shall collect and record the following HAP information each month for emissions units R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, R013, R014, R015, R101, R102, R103, R105, R108, R109, R110, R111 and R112 , combined:

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

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

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

d. the emission rate for each individual HAP from each coating and cleanup material employed (b times c) for each individual HAP, in lbs;

e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d for all coatings and cleanup materials), in lbs;

f. the total HAP emission rate for all HAPs, combined from all the coatings and cleanup materials employed (summation of e for all HAPs for all coatings and cleanup materials), in lbs; and

g. the rolling, 12-month emissions of each individual HAP and all HAPs, combined, in tons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

(4) 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 Northwest District Office upon request.

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

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.

(6) 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 the person who performed the inspection.

The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was 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 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 Northwest District Office upon request.

(7) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b) and OAC rule 3745-114-01, was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified Permit to Install (PTI), 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

e) Reporting Requirements

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

a. all exceedances of the rolling, 12-month emission limitation of 230.0 tons (for emissions units R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, R013, R014, R015, R101, R102, R103, R105, R108, R109, R110, R111 and R112 , combined).

b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.90 tons and 24.90 tons, respectively (for emissions units R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, R013, R014, R101, R102, R103, R105, R018, R109, R110, R111 and R112 , combined).

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

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

(3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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. Emission Limitation: 9.10 lbs OC/hr, from coatings operations

Applicable Compliance Method: The hourly allowable OC emission limitation above represents the potential to emit for this emissions unit and was established by multiplying the maximum hourly coating usage rate (2.0 gallons per hour) by the maximum OC coating content (4.55 pounds of OC per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

b. Emission Limitation: 230.0 tons of OC per rolling, 12-month period, from coating and cleanup materials employed in emissions units R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, R013, R014, R015 R101, R102, R103, R105, R108, R109, R110, R111 and R112, combined.

Applicable Compliance Method: Compliance with the annual allowable OC emission limitation above shall be based upon the record keeping requirements specified in section d)(2).

c. Emission Limitation: 9.90 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.90 tons per rolling, 12-month period for any combination of HAPs [for emissions units R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, R013, R014, R015, R101, R102, R103, R105, R108, R109, R110, R111 and R112 , combined]

Applicable Compliance Method: Compliance with the annual allowable HAP emission limitations above shall be based upon the record keeping requirements specified in section d)(3).

d. Emission Limitation: The OC content of any cleanup material employed in this emissions unit shall not exceed 7.34 lbs OC/gallon.

Applicable Compliance Method: Compliance with the OC content limitation above shall be based upon the record keeping requirements specified in section d)(2).

e. Emission Limitation: 0.551 pound PE per hour

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operation:

E = PE rate (lbs/hr) where

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment (established at > 98%)

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

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

Applicable Compliance Method: If required, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1).

(2) Formulation data of USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials.

g) Miscellaneous Requirements

(1) None.