State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

04/22/03

CERTIFIED MAIL

RE: Final Title V Administrative Permit Amendment Chapter 3745-77 permit

05-75-01-0103
Alcoa Building Products, Inc
Jesse D Aiken
Alcoa Building Products, Inc.
2615 Campbell Road
Sidney, OH 45365

Dear Jesse D Aiken:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact Southwest District Office.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Southwest District Office
File, DAPC PMU

State of Ohio Environmental Protection Agency

FINAL TITLE V ADMINISTRATIVE PERMIT AMENDMENT

Effective Date: **05/12/03**	Expiration Date: **05/12/08**	Modification Issue Date: **04/22/03**

This document constitutes issuance of a Title V permit for Facility ID: 05-75-01-0103 to:
Alcoa Building Products, Inc
2615 Campbell Road
P. O. Box 176
Sidney, OH 45365-0176

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B009 (Production Area AMU) Production Area Air Makeup Unit, 10 mmBTU/hr	K001 (39" Coil Coating Line) Coil Coating Line W/Pretreatment; 39 Inch Coil Coating Line	Coil Coating Line W/Assoc. Drying Ovens
B010 (Slitter Area AMU) Slitter Area Air Makeup Unit, 10 mmBTU/hr	K002 (54" Coil Coating Line) Coil Coating Line With Ovens: Incinerator; 54"	P010 (Paint Mix Room) Paint Mix/Clean-Up Room

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Southwest District Office
401 East Fifth Street
Dayton, OH 45402-2911
(513) 285-6357

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

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

B001 - (Eq. #12-17)
B002 - (Eq. #12-18)
B003 - (Eq. #12-19)
B004 - (Eq. #12-26)
B005 - (Eq. #12-27)
B006 - (Eq. #12-28)
B007 - (Eq. #12-35)
B008 - (Eq. #12-36)
T005 - (5200 Gal. Rect. Tank #1)
T006 - (5200 Gal. Rect. Tank #2)
T007 - (5200 Gal. Rect. Tank #3)
T008 - (5200 Gal. Rect. Tank #4)
T009 - (6000 Gal. Cyl. Tank #5)
T010 - (6000 Gal. Cyl. Tank #6)
T011 - (6000 Gal. Cyl. Tank #7)
T012 - (6000 Gal. Cyl. Tank #8)
Z003 - (Trim Sheet Area AMU)
Z004 - (Diesel Backup Water Pump)
Z005 - (Site Roadways)
Z101 - (39" Slitter)
Z102 - (54" Slitter)
Z103 - (24" Slitter)
Z111 - (Band Saws)
Z112 - (Belt Sanders)
Z113 - (Cutoff Saws)
Z114 - (Paint Roll Grind)
Z115 - (Maintenance Lathe)
Z116 - (Wood Shop)
Z117 - (Paint Roll Grind)
Z141 - (Cooling Tower #2)
Z142 - (Cooling Tower #3)
Z143 - (Cooling Tower #4)
Z151 - (Core Cutter)
Z162 - (Weathering Lab)
Z171 - (Graymills Parts Washer)
Z172 - (Maintenance Parts Washer)
Z173 - (Tow Motor Repair Parts Washer #1)
Z174 - (Tow Motor Repair Parts Washer #2)
Z200 - (Perforator Machine)
Z201 - (Roll Former Line #1)
Z202 - (Roll Former Line #2)
Z203 - (Roll Former Line #3)
Z204 - (Roll Former Line #4)
Z205 - (Roll Former Line #Z205)
Z206 - (Roll Former Line #6)
Z207 - (Roll Former Line #7)
Z208 - (Roll Former Line #8)
Z209 - (Roll Former Line #9)
Z210 - (Roll Former Line #10)
Z211 - (Roll Former Line #11)
Z212 - (Roll Former Line #12)
Z213 - (Roll Former Line #13)
Z214 - (Roll Former Line #14)
Z215 - (Roll Former Line #15)
Z216 - (Roll Former Line #16)

B. State Only Enforceable Section

Z216 - (Roll Former Line #16)
Z217 - (Roll Former Line #17)
Z218 - (Roll Former Line #18)
Z219 - (Roll Former Line #19)
Z220 - (Roll Former Line #20)

Z221 - (Roll Former Line #21)
Z222 - (Roll Former Line #22)
Z225 - (Roll Former Line #25)
Z226 - (Roll Former Line #26)
Z231 - (Trim Line #1)
Z232 - (Trim Line #2)
Z233 - (Trim Line #3)
Z241 - (Roll Former Cleanup)
Z251 - (Primer Tank)
Z252 - (Neutralization Tank System)
Z253 - (Potassium Hydroxide Tank)
Z254 - (Waste Paint Storage Tank)
Z255 - (Solvent Storage Tank #1)
Z256 - (Solvent Storage Tank #2)
Z257 - (Solvent Storage Tank #3)
Z261 - (Totes and Drums)

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Production Area AMU (B009)

Activity Description: Production Area Air Makeup Unit, 10 mmBTU/hr

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
10 mmBtu/hr, production area natural gas (with propane as backup fuel), direct-fired air make-up unit	OAC rule 3745-17-11(B)	None, see A.I.2.b.
	OAC rule 3745-17-07(A)	None, see A.I.2.c.
	OAC rule 3745-18-06(E)	none, exempt pursuant to OAC rule 3745-18-06(C) (see A.I.2.a)

2. Additional Terms and Conditions

2.a There are no sulfur dioxide emission limitations established by OAC Chapter 3745-18 for this emissions unit because the process weight rate is less than 1,000 pounds/hour.

2.b The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

* The burning of natural gas is the only source of PE from this emissions unit.

2.c This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

II. Operational Restrictions

1. The permittee shall burn only gaseous fuels (i.e., natural gas and/or propane gas) in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than a gaseous fuel (i.e., natural gas and/or propane gas), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or propane gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitation: 0.020 pound PE/mmBtu of actual heat input

Applicable Compliance Method:
The permittee may demonstrate compliance with the allowable PE limitation above by multiplying the maximum hourly natural and/or propane gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

If required, compliance with the lb PE/mmBtu allowable PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

1.b Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Slitter Area AMU (B010)

Activity Description: Slitter Area Air Makeup Unit, 10 mmBTU/hr

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
10 mmBtu/hr, production area natural gas (with propane as backup fuel), direct-fired air make-up unit	OAC rule 3745-17-11(B)	None, see A.I.2.b.
	OAC rule 3745-17-07(A)	None, see A.I.2.c.
	OAC rule 3745-18-06(E)	none, exempt pursuant to OAC rule 3745-18-06(C) (see A.I.2.a)

2. Additional Terms and Conditions

2.a There are no sulfur dioxide emission limitations established by OAC Chapter 3745-18 for this emissions unit because the process weight rate is less than 1,000 pounds/hour.

2.b The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

* The burning of natural gas is the only source of PE from this emissions unit.

2.c This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

II. Operational Restrictions

1. The permittee shall burn only gaseous fuels (i.e., natural gas and/or propane gas) in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than a gaseous fuel (i.e., natural gas and/or propane gas), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or propane gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitation: 0.020 pound PE/mmBtu of actual heat input

Applicable Compliance Method:
The permittee may demonstrate compliance with the allowable PE limitation above by multiplying the maximum hourly natural and/or propane gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (mmBtu/hr).

If required, compliance with the lb PE/mmBtu allowable PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

1.b Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 39" Coil Coating Line (K001)

Activity Description: Coil Coating Line W/Pretreatment; 39 Inch Coil Coating Line

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
39" coil coating line with 2 natural gas, direct-fired ovens, equipped with a thermal incinerator	OAC rule 3745-21-09(E)	when the VOC emissions from the coatings are not vented to the thermal incinerator, less than or equal to 2.6 pounds of VOC per gallon of coating, excluding water and exempt solvents (see A.I.2.d)
	OAC rule 3745-21-09(E)	when the VOC emissions from the coatings are vented to the thermal incinerator, 4.0 pounds of VOC per gallon of solids from a prime coat, topcoat, or single coat (see A.I.2.d)
	OAC rule 3745-21-09(B)(6)	in lieu of OAC rule 3745-21-09(E), when the VOC emissions from the coatings are vented to the thermal incinerator, minimum 81% overall VOC reduction, by weight, from the coating line and a minimum 90%, by weight, VOC destruction efficiency for the thermal incinerator (see A.I.2.d)
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-17-07(A)	See A.I.2.c.
	OAC rule 3745-18-06(E)	none, exempt pursuant to OAC rule 3745-18-06(C) (see A.I.2.a)

2. Additional Terms and Conditions

2.a There are no sulfur dioxide emission limitations established by OAC Chapter 3745-18 for this emissions unit because the process weight rate is less than 1,000 pounds/hour.

2. Additional Terms and Conditions (continued)

2.b The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

* The burning of natural gas is the only source of PE from this emissions unit.

2.c This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

2.d Each coating vented directly to the atmosphere shall meet the VOC content limitation of 2.6 lbs/gallon of coating, excluding water and exempt solvents on "as applied" basis. Each coating vented to the thermal incinerator shall meet the VOC content limitation of 4.0 lbs/gallon of coating solids (after application of controls), or the permittee shall demonstrate that the thermal incinerator meets the control efficiency requirements specified in OAC rule 3745-21-09(B)(6).

II. Operational Restrictions

1. When the emissions unit is operating and venting to the thermal incinerator:

The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance (the most recent emission test that demonstrated compliance was conducted on November 29, 1995 with an average combustion chamber temperature of 1050 degrees Fahrenheit. The combustion chamber temperature reference is subject to revision, if during the term of this permit, additional emission testings are conducted that demonstrated the unit is in compliance).

2. The permittee shall burn only gaseous fuels (i.e., natural gas and/or propane gas) in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. When the emissions unit is operating and venting to the thermal incinerator:

The permittee shall operate and maintain a continuous temperature monitor and recorder that measures a records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day the VOC emissions are vented to the thermal incinerator:

a. A log or record of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall maintain monthly records that list the following information for this emissions unit:

a. The company identification of each coating employed.

b. The VOC content, in pounds per gallon (excluding water and exempt solvents), for each coating vented directly to the atmosphere.

c. The VOC content, in pounds per gallon of coating solids and in pounds/gallon of coating, as applied, the volume solids content, as applied, and the volume, in gallons, as applied, of each coating vented to the thermal incinerator .

d. The uncontrolled VOC emission rate for each coating vented to the thermal incinerator (lbs VOC/gallon of coating x the number of gallons of each coating), in pounds.

e. The calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied, for each coating vented to the thermal incinerator [the value from (d) multiplied by (1 - the overall control efficiency from the most recent performance test that demonstrated the emissions unit was in compliance)/(the number of gallons of each coating x the volume solids content of each coating)].

[Note: If the permittee chooses to demonstrate and maintain compliance with the minimum 81% overall VOC reduction, by weight, from the coating line and a minimum 90%, by weight, VOC destruction efficiency for the thermal incinerator, the permittee does not have to keep the records required in sections A.III.2.c through A.III.2.e to demonstrate compliance with the 4.0 pounds VOC/gallon of solids for each coating vented to the thermal incinerator.]

3. For each day during which the permittee burns a fuel other than a gaseous fuel (i.e., natural gas and/or propane gas), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. For periods when the emissions unit was operating and venting to the thermal incinerator:

a. The permittee shall submit to the Director (the Ohio EPA, Southwest District Office) quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation. The quarterly summaries shall be submitted by March 31, June 30, September 30 and December 31 of each year and shall cover the previous calendar quarter.

b. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated compliance. The quarterly deviation reports shall be submitted in accordance with paragraph A.I.c of the General Terms and Conditions of this permit.

c. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content, in pounds VOC/gallon of coating solids). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days following the end of the calendar month.

[Note: If the permittee chooses to demonstrate and maintain compliance with the minimum 81% overall VOC reduction, by weight, from the coating line and a minimum 90%, by weight, VOC destruction efficiency for the thermal incinerator, the permittee does not have to submit the reports required in section A.IV.1.c.]

IV. Reporting Requirements (continued)

2. For periods when the emissions unit was operating and not venting to the thermal incinerator:

The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content, in pounds VOC/gallon of coating, excluding water and exempt solvents). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days following the end of the calendar month.

3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or propane gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

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

1.a Emission Limitation -
less than or equal to 2.6 lbs VOC/gallon of coating, excluding water and exempt solvents, when not employing the thermal incinerator

less than or equal to 4.0 lbs VOC/gallon of coating solids, when employing the thermal incinerator

Applicable Compliance Method -
The permittee shall demonstrate compliance based upon the record keeping requirements specified in Sections A.III.2 and 3 of this permit.

1.b Emission Limitation-
minimum 81% overall VOC reduction, by weight, from the coating line and a minimum 90%, by weight, VOC destruction efficiency for the thermal incinerator

Applicable Compliance Method-
Compliance shall be based on the results of stack testing conducted in accordance with the requirements established in section A.V.2 of this permit.

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

V. Testing Requirements (continued)

2. 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 within 6 months following the issuance of this permit and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency and the thermal incinerator destruction efficiency.

c. The following test method(s) shall be employed to demonstrate compliance:

The capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement. The destruction efficiency shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of volatile organic compound.

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, Southwest District Office.

Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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

A comprehensive written report on the results of the emissions tests shall be signed and submitted to the Ohio EPA, Southwest 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, Southwest District Office.

3. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Director 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. This analysis shall be performed during performance testing evaluations of the emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 54" Coil Coating Line (K002)

Activity Description: Coil Coating Line With Ovens: Incinerator; 54" Coil Coating Line W/Assoc. Drying Ovens

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
54" coil coating line, with thermal incinerator	OAC rule 3745-31-05(A)(3) PTI #05-01309	for coatings vented directly to the atmosphere, less than or equal to 1.118 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents (see A.I.2.b) for coatings vented to the thermal incinerator, less than or equal to 1.118 lbs VOC/gallon of coating, excluding water and exempt solvents (after application of emission controls) (see A.I.2.b) 336.5 tons VOC/year, including cleanup materials See A.I.2.a. The requirements of this rule also include compliance with the requirements specified by OAC rule 3745-21-09(B)(6).
	OAC rule 3745-21-09(E)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09(B)(6)	minimum 81% overall VOC reduction, by weight, from the coating line and a minimum 90%, by weight, VOC destruction efficiency (for the thermal incinerator)

2. Additional Terms and Conditions

2.a The 1.118 lbs VOC/gallon of coating (excluding water and exempt solvent) limit was established as a result of netting emissions from this emissions unit to provide credit for the installation of the emissions unit included in PTI #05-1309 for the Alcoa Memory Products facility.

2.b Each coating vented directly to the atmosphere shall meet the VOC content limitation of 1.118 lbs/gallon of coating, excluding water and exempt solvents on "as applied" basis. Each coating vented to the thermal incinerator shall meet the VOC content limitation of 1.118 lbs/gallon of coating, excluding water and exempt solvents (after application of emission controls).

2.c There is no combustion occurring in the ovens associated with this emissions unit. The ovens are heated with air warmed by means of heat-exchanging with the thermal incinerator serving this emissions unit. Therefore, OAC rules 3745-17-10(B), 3745-17-07(A), 3745-23-06(B) and 3745-21-08(B) are not applicable to the ovens associated with this emissions unit.

II. Operational Restrictions

1. When the emissions unit is operating and venting to the thermal incinerator:

The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance (the most recent emission test that demonstrated compliance was conducted on November 29, 1995 with an average combustion chamber temperature of 1450 degrees Fahrenheit. The combustion chamber temperature reference is subject to revision, if during the term of this permit, additional emission testings are conducted that demonstrated the unit is in compliance).

III. Monitoring and/or Record Keeping Requirements

1. When the emissions unit is operating and venting to the thermal incinerator:

The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day the VOC emissions are vented to the thermal incinerator:

a. A log or record of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

b. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall maintain monthly records that list the following information for this emissions unit:

a. The company identification for each coating employed and whether each coating is vented directly to the atmosphere or to the thermal incinerator.

b. The VOC content, in pounds/gallon (excluding water and exempt solvents), of each coating employed.

c. The number of gallons, excluding water and exempt solvents, of each coating employed.

d. The uncontrolled VOC emission rate for each coating vented to the thermal incinerator (b x c), in pounds.

e. The calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied, for each coating vented to the thermal incinerator [(the value from (d) multiplied by (1 - the overall control efficiency from the most recent performance test that demonstrated the emissions unit was in compliance)/the number of gallons, excluding water and exempt solvents, of each coating vented to the thermal incinerator].

f. The total actual VOC emissions for all the coatings employed, in tons, calculated as follows:

i. sum the total VOC emissions for all the coatings vented directly to the atmosphere [summation of (b x c) for all coatings vented to the atmosphere], and then divide by 2000;

ii. sum the total VOC emissions for all the coatings vented to the incinerator [summation of (the value from (d) multiplied by (1 - the overall control efficiency from the most recent performance test that demonstrated the emissions unit was in compliance)) for all coatings vented to the thermal incinerator], and then divide by 2000; and

iii. sum i + ii above.

3. The permittee shall maintain monthly records that list the following information for this emissions unit:

a. The company identification of each solvent cleanup material employed.

b. The number of gallons of each solvent cleanup material employed.

c. The VOC content for each solvent cleanup material employed, in pounds per gallon.

d. The total actual VOC emission rate for all the solvent cleanup materials employed, in tons.

e. The total actual VOC emission rate for all the coatings and solvent cleanup materials employed [A.III.3.d + A.III.2.f.iii], in tons.

IV. Reporting Requirements

1. For periods when the emissions unit was operating and venting to the thermal incinerator:

a. The permittee shall submit to the Director (the Ohio EPA, Southwest District Office) quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation. The quarterly summaries shall be submitted by March 31, June 30, September 30 and December 31 of each year and shall cover the previous calendar quarter.

b. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated compliance. The quarterly deviation reports shall be submitted in accordance with paragraph A.I.c of the General Terms and Conditions of this permit.

c. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any monthly record showing the use of noncomplying coatings (i.e., for the VOC content of each coating for which the VOC emissions were vented to the thermal incinerator). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days following the end of the calendar month.

2. For periods when the emissions unit was operating and not venting to the thermal incinerator:

The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any daily record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days following the end of the calendar month.

3. The permittee shall submit annual reports that summarize the actual annual VOC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

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

1.a Emission Limitations -
less than or equal to 1.118 lbs VOC/gallon, excluding water and exempt solvents, OR 1.118 lbs VOC/gallon, excluding water and exempt solvents, after application of emissions control

Applicable Compliance Method -
The permittee shall demonstrate compliance with the above limitation based upon the record keeping requirements established in section A.III of this permit.

1.b Emission Limitation-
minimum 81% overall VOC reduction, by weight, from the coating line and a minimum 90%, by weight, VOC destruction efficiency for the thermal incinerator

Applicable Compliance Method-
Compliance shall be based on the results of stack testing conducted in accordance with the requirements established in section A.V.3 of this permit.

1.c Emission Limitations -
336.5 tons VOC/year

Applicable Compliance Method -
The permittee shall demonstrate compliance with the annual allowable VOC emission limitation above based upon the record keeping requirements established in Sections A.III.2 and 3 of this permit and shall be the summation of the 12 monthly VOC emission rates for the calendar year.

V. Testing Requirements (continued)

2. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Director 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. This analysis shall be performed during performance testing evaluations of the emissions unit.

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 within 6 months following the issuance of this permit and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency and the thermal incinerator destruction efficiency.

c. The following test method(s) shall be employed to demonstrate compliance:

The capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement. The destruction efficiency shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of volatile organic compound.

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, Southwest District Office.

Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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

A comprehensive written report on the results of the emissions tests shall be signed and submitted to the Ohio EPA, Southwest 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, Southwest District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Mix Room (P010)

Activity Description: Paint Mix/Clean-Up Room

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mix room/cleanup area	OAC rule 3745-21-07(G)	None, see A.I.2.a.

2. Additional Terms and Conditions

2.a This emissions unit is located in Shelby County (which is not a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06) and is not a "new source." Therefore, pursuant to OAC rule 3745-21-07(A), it is exempt from the requirements of OAC rule 3745-21-07(G).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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