Ohio Environmental Protection Agency

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

Certified Mail

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

10/4/2010

Gary Goll
Anderson and Vreeland Midwest, Inc.
State Route 127
Bryan, OH 43506

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0386010105
Permit Number: P0087823
Permit Type: Initial Installation
County: Williams

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) 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, The Bryan Times. 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; Michigan; Indiana

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description:

   Anderson & Vreeland Midwest, Inc. is requesting a federally enforceable permit to install/operate for their matrix spray coating operation located at their Bryan Ohio Plant. The coating operation was installed in 1963 and consists of the paint mix room (ball mill pain mixer), a matrix coating spray booth, and 2 drying ovens.

3. Facility Emissions and Attainment Status:

   The application request federally enforceable restrictions to ensure the facility is not a Major source for Title V for Volatile Organic Compounds (VOCs). The permittee is requesting an annual solvent usage restriction of 29,400 gallons/rolling, 12-month period and a solvent content restriction of 6.59 lbs VOC/gallon, resulting in VOC emissions of 96.87 tons/rolling, 12-month period from mixing, coating, drying, and cleaning operations for emissions units P001(Paint Mix Room/Ball Mill) and R002 (Matrix Coating Spray Booth and Electric Drying Ovens) combined. Williams County is classified as attainment for all criteria pollutants.

4. Source Emissions:

   The federally enforceable restriction of 29,400 gallons/rolling, 12-month period and a solvent content restriction of 6.59 lbs VOC/gallon, will result in VOC emissions of 96.87 tons/rolling, 12-month period from mixing, coating, drying, and cleaning operations for emissions units P001and R002 combined.

5. Conclusion:

   The federally enforceable limitations on the potential to emit from this operation will maintain the facilities current emissions level below Title applicability.

6. Please provide additional notes or comments as necessary:

   None

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

Pollutant	Tons Per Year
VOC	96.87

Williams County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Anderson and Vreeland Midwest, Inc.

Issue Date: 10/4/2010
Permit Number: P0087823
Permit Type: Initial Installation
Permit Description: Matrix spray coating operation consisting of a ball mill paint mixer w/baghouse and matrix spray coating line with 2 drying ovens and baghouse.
Facility ID: 0386010105
Facility Location: Anderson and Vreeland Midwest, Inc.
State Route 127,
Bryan, OH 43506
Facility Description: All Other Industrial Machinery 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, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. 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 and Operate
for
Anderson and Vreeland Midwest, Inc.

Facility ID:	0386010105
Permit Number:	P0087823
Permit Type:	Initial Installation
Issued:	10/4/2010
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Anderson and Vreeland Midwest, Inc.

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

1. What does this permit-to-install and operate ("PTIO") allow me to do? 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them? 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 5
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? 6
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator? 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7

B. Facility-Wide Terms and Conditions 8

C. Emissions Unit Terms and Conditions 10

1. P001, Mix Room/Ball Mill 11
2. R002, Matrix Spray Booth 15

Authorization

Facility ID: 0386010105
Application Number(s): A0018894
Permit Number: P0087823
Permit Description: Matrix spray coating operation consisting of a ball mill paint mixer w/baghouse and matrix spray coating line with 2 drying ovens and baghouse.
Permit Type: Initial Installation
Permit Fee: $0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 10/4/2010
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Anderson and Vreeland Midwest, Inc.
State Route 127
Bryan, OH 43506

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0087823
Permit Description: Matrix spray coating operation consisting of a ball mill paint mixer w/baghouse and matrix spray coating line with 2 drying ovens and baghouse.

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

Emissions Unit ID:	**P001**
Company Equipment ID:	Mix Room/Ball Mill
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R002**
Company Equipment ID:	Matrix Spray Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.
If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

while the emissions unit was in operation, for at least five years from the date the record was generated.
Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. P001, Mix Room/Ball Mill

Operations, Property and/or Equipment Description:

Paint Mix Room

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

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

a. None.

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

a. b)(1)a., b)(2)a., c)(1), d)(1), e)(1), and f)(1)a. through f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (D)	96.87 tons volatile organic compounds (VOC)/rolling, 12-month period, from mixing, coating, drying and cleaning operations from emissions units P001 and R002, combined [See b)(2)a.i. and c)(1)]
b.	OAC rule 3745-21-07(G)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)d.

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V regulations:

i. 96.87 tons VOC/rolling, 12-month period, from mixing, coating, drying, and cleaning operations from emissions units P001 and R002, combined [See c)(1)].

b. OAC rule 3745-21-07(G)(2) does not apply to this emissions unit because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

[Note: On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 which includes OAC rule 3745-21-07(G)(2) of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves the revision to Ohio's State Implementation Plan (SIP)].

c. The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Williams County.

d. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11(B) is not applicable.

c) Operational Restrictions

(1) The maximum annual solvent usage from mixing, coating, drying and cleaning operations from emissions units P001 and R002, combined, shall not exceed 29,400 gallons of solvent per year with a maximum solvent content of 6.59 lbs VOC/gallon.

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

Calendar Month(s)	Maximum Allowable Solvent Usage (gallons)
1-1	2,450
1-2	4,900
1-3	7,350
1-4	9,800
1-5	12,250
1-6	14,700
1-7	17,150
1-8	19,600
1-9	22,050
1-10	24,500
1-11	26,950
1-12	29,400

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information each month for solvents employed in emissions units P001 and R002, combined:

a. the company name or identification for each solvent employed;

b. the volume, in gallons, of each solvent employed;

c. the VOC content of each solvent employed, in pounds per gallon, as applied;

d. the VOC emission rate, in pounds, for each solvent employed [d)(1)b. times d)(1)c.];

e. the total VOC emission rate from all solvents employed [summation of d)(1)d.], in pounds or tons;

f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total VOC emissions, in tons;

g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month VOC emission rates, in tons;

h. for the first 12-months of operation, the cumulative solvent usage, in gallons; and

i. beginning the first month after the first 12 calendar months of operation, the rolling, 12-month summation of solvent usage, in gallons.

e) Reporting Requirements

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 96.87 tons VOC/rolling, 12-month period from mixing, coating, drying and cleaning operations from emissions units P001 and R002, combined;

ii. 29,400 gallons solvent usage per rolling, 12-month period for emissions units P001 and R002, combined; and

iii. 6.59 lbs VOC/gallon for each solvent employed in emissions units P001 and R002.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

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

f) Testing Requirements

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

a. Emission Limitation:
96.87 tons VOC/rolling, 12-month period from mixing, coating, drying and cleaning operations from emissions units P001 and R002, combined

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section d)(1) of this permit.

b. Emission Limitation:
29,400 gallons solvent usage per rolling, 12-month period for emissions units P001 and R002, combined

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section d)(1) of this permit.

c. Emission Limitation:
6.59 lbs VOC/gallon for each solvent employed in emissions units P001 and R002.Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section d)(1) of this permit.

Formulation data or USEPA Method 24 shall be used to calculate the VOC contents of all the coating materials.

g) Miscellaneous Requirements

(1) None.

2. R002, Matrix Spray Booth

Operations, Property and/or Equipment Description:

Fiberboard matrix spray booth with 2 electric drying ovens.

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

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

a. None.

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

a. b)(1)a., b)(2)a., c)(1), d)(1), e)(1), and f)(1)a. through f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (D)	96.87 tons VOC/rolling, 12-month period from mixing, coating, drying and cleaning operations from emissions units P001 and R002 combined [See b)(2)a.i. and c)(1)]
b.	OAC rule 3745-21-07 (G)(2)	See b)(2)b.
c.	OAC rule 3745-17-11 (B)	See b)(2)c. and b)(2)e.
d.	OAC rule 3745-17-11 (C)	See b)(2)d.
e.	OAC rule 3745-17-07 (A)	See b)(2)e. and b)(2)f.

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V regulations:

i. 96.87 tons VOC/rolling, 12-month period from mixing, coating, drying and cleaning operations from emissions units P001 and R002 combined [See c)(1)].

b. OAC Rule 3745-21-07(G)(2) does not apply to this emissions unit because the facility is not located in a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new source."

On February 18, 2008 Ohio EPA rescinded existing rule 3745-21-07 of the Ohio Administrative Code (OAC) and adopted new rule 3745-21-07. The new OAC rule 3745-21-07 does not establish any requirements for this emissions unit. The rule rescindment and new rule shall be federally enforceable on the date the U.S. EPA approves a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the rule rescindment and new OAC rule 3745-21-07, the requirement to comply with OAC rule 3745-21-07(G)(2) still exists as part of the federally-approved SIP of Ohio. It should be noted that the requirements to comply with OAC rule 3745-21-07(G)(2) shall terminate on the date the U.S. EPA approves the rule rescindment and new rule as a revision of the Ohio SIP.

c. The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Williams County.

d. 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.

e. 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.

f. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11(B) is not applicable.

c) Operational Restrictions

(1) The maximum annual solvent usage from mixing, coating, drying and cleaning operations for emissions units P001 and R002, combined, shall not exceed 29,400 gallons of solvent per year with a maximum solvent content of 6.59 lbs VOC/gallon.

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

Calendar Month(s)	Maximum Allowable Solvent Usage (gallons)
1-1	2,450
1-2	4,900
1-3	7,350
1-4	9,800
1-5	12,250
1-6	14,700
1-7	17,150
1-8	19,600
1-9	22,050
1-10	24,500
1-11	26,950
1-12	29,400

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

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

(3) The permittee shall expeditiously repair the baghouse or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information each month for solvents employed in emissions units P001 and R002, combined:

a. the company name or identification for each solvent employed;

b. the volume, in gallons, of each solvent employed;

c. the VOC content of each solvent employed, in pounds per gallon, as applied;

d. the VOC emission rate, in pounds, for each solvent employed [d)(1)b. times d)(1)c.];

e. the total VOC emission rate from all solvents employed [summation of d)(1)d.], in pounds or tons;

f. for the first 12 months of operation, under the provisions of this permit, the cumulative year-to-date total VOC emissions, in tons;

g. beginning the first month, after the first 12 months of operation under the provisions of this permit, the rolling, 12-month VOC emission rates, in tons;

h. for the first 12-months of operation, the cumulative solvent usage, in gallons; and

i. beginning the first month after the first 12 calendar months of operation, the rolling, 12-month summation of solvent usage, in gallons.

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

(3) The permittee shall conduct periodic inspections of the baghouse 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.

(4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the baghouse 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.

(5) The permittee shall document each inspection (periodic and annual) of the baghouse and shall maintain the following information:

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

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

(6) The permittee shall maintain records that document any time periods when the baghouse was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 96.87 tons VOC/rolling, 12-month period from mixing, coating, drying and cleaning operations from emissions units P001 and R002, combined

ii. 29,400 gallons solvent usage per rolling, 12-month period; for emissions units P001 and R002, combined; and

iii. 6.59 lbs VOC/gallon for each solvent employed in emissions units P001 and R002.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

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

f) Testing Requirements

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

a. <u>Emission Limitation:</u>
96.87 tons VOC/rolling, 12-month period, from mixing, coating, drying and cleaning operations from emissions units P001 and R002, combined

<u>Applicable Compliance Method:</u>
Compliance shall be based upon the record keeping requirements specified in Section d)(1) of this permit.

b. Emission Limitation:
29,400 gallons solvent usage per rolling, 12-month period; for emissions units P001 and R002, combined

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section d)(1) of this permit.

c. Emission Limitation:
6.59 lbs VOC/gallon for each solvent employed in emissions units P001 and R002.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section d)(1) of this permit.

Formulation data or USEPA Method 24 shall be used to calculate the VOC contents of all the coating materials.

g) Miscellaneous Requirements

(1) None.