



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

07/12/02

**CERTIFIED MAIL**

**RE: Final Title V Chapter 3745-77 permit**

03-26-00-0040  
ITT Automotive Archbold Plant  
Jaimin Patel Mr.  
701 East Lugbill  
Archbold, OH 43502

Dear Jaimin Patel:

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 Northwest District Office.

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: Northwest District Office  
File, DAPC PMU



State of Ohio Environmental Protection Agency

**FINAL TITLE V PERMIT**

Issue Date: <b>07/12/02</b>	Effective Date: <b>07/12/02</b>	Expiration Date: <b>07/12/07</b>
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This document constitutes issuance of a Title V permit for Facility ID: 03-26-00-0040 to:

ITT Automotive Archbold Plant

701 East Lugbill Road

Archbold, OH 43502

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

B003 (Space Heater) Natural Gas Heating and Ventilation System - 11.75 MM BTU/hr	Coating line with oven and incinerator	Process
B004 (Space Heater) Natural Gas Heating and Ventilation System - 11.75 MM BTU/hr	K011 (Procoat Line C) Coating line with oven and incinerator	P022 (#3 Braze Furnace) Electric resistance brazing furnace - Inline Braze Process
K008 (Procoat 2000 Line A) Coating line with oven and incinerator	P020 (#1 Braze Furnace) Electric resistance brazing furnace - Inline Braze Process	P023 (#4 Braze Furnace) Electric resistance brazing furnace - Inline Braze Process
K009 (Procoat 2000 Line 2/B)	P021 (#2 Braze Furnace) Electric resistance brazing furnace - Inline Braze	

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:

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. *State and Federally Enforceable Section*

#### 1. **Monitoring and Related Record Keeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*
- c. The permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*
  - ii. **For emission limitations, operational restrictions, and control device operating parameter limitations:**
    - (a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring and record keeping requirements specified in this permit; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters. In identifying each deviation, the permittee shall specify the applicable requirement for which the

deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) ,(ii) and (iii))*

- (b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))*

iii. **For monitoring, record keeping, and reporting requirements:**

Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and

reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*

- iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

## **2. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit(s) or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))*

## **3. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

## **4. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

## **5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

## **6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

*(Authority for term: OAC rule 3745-77-07(A)(7))*

**7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**8. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**9. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**10. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.  
*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

## **11. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*

## **12. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

- i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

### **13. Permit Shield**

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

#### **14. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

#### **15. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

#### **16. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as

insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)  
(*Authority for term: OAC rule 3745-77-07(I)*)

#### **17. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(*This term is provided for informational purposes only.*)

#### **18. Insignificant Activities**

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

(*Authority for term: OAC rule 3745-77-07(A)(1)*)

#### **19. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(*Authority for term: OAC rule 3745-77-07(A)(1)*)

#### **20. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

## **B. State Only Enforceable Section**

### **1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **2. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

### **3. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee

shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**4. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**5. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

## 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:

B002	Plating Boiler
B005	Space Heater
L001	Cold Cleaner
L002	Cold Cleaner
L003	Cold Cleaner
L004	Cold Cleaner
L005	Cold Cleaner
P005	Tern Line
P006	Tern Line
P008	Weld Mill
P009	Weld Mill
P010	Plating Line
P018	Braze Preheater
P019	Braze Oven
P024	Brushing Station
P025	Brushing Station
P026	Brushing Station
P027	Brushing Station
P030	Armor Winder
P015	Metal Treatment
P016	Metal Treatment
P017	Metal Treatment
P031	Metal Treatment
P032	Metal Treatment
P033	Metal Treatment
Z001	Extruder
Z011	Pickling Line
Z012	Galfan Coating
Z013	Phosphate Claening
Z014	Weld Mill
P801	Facility Cleaning Solvent Usage

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:** Space Heater (B003)

**Activity Description:** Natural Gas Heating and Ventilation System - 11.75 MM BTU/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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
11.75 mmBtu, natural gas space heater #1	OAC rule 3745-31-05(A)(3) (PTI #03-5042)	0.16 lb nitrogen oxides (NOx)/mmBtu of actual heat input  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10(B)(1) and OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	20 percent opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-17-10(B)(1)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input

##### 2. Additional Terms and Conditions

- 2.a Since natural gas is the only fuel fired in this emissions unit, no SO<sub>2</sub> emission limitation is established by OAC Chapter 3745-18 for this emissions unit.

##### II. Operational Restrictions

1. The permittee shall burn only natural 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 natural 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 was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

##### V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):

## **V. Testing Requirements (continued)**

- 1.a** Emission Limitation:  
0.020 lb PE/mmBtu of actual heat input

**Applicable Compliance Method:**

The permittee may determine compliance with the limitation above by multiplying the emissions unit's maximum burning capacity of natural gas (11,750 cubic feet/hr) by the AP-42, Table 1.4-2 emission factor [1.9 lbs PE (filterable)/mmcu.ft.]\*, and then dividing by the emissions unit's maximum heat input capacity (11.75 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the limitation above in accordance with the methods specified in OAC 3745-17-03(B)(9).

\* This emission factor is specified in USEPA reference document AP-42, Fifth Edition (revised 7/98), Section 1.4, Table 1.4-2.

- 1.b** Emission Limitation:  
20 percent opacity, as a six-minute average, except as otherwise provided by rule

**Applicable Compliance Method:**

If required, the permittee shall demonstrate compliance with the visible emissions limitation above in accordance with the methods specified in OAC 3745-17-03(B)(1).

- 1.c** Emission Limitation:  
0.16 lb NOx/mmBtu of actual heat input

**Applicable Compliance Method:**

The permittee may determine compliance with this emission limitation based upon multiplying the emissions unit's maximum burning capacity of natural gas (11,750 cubic feet/hr) by the AP-42, Table 1.4-1 emission factor [100 lbs NOx/mmcu.ft.]\*, and then dividing by the emissions unit's maximum heat input capacity (11.75 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the limitation above pursuant to Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

\* This emission factor is specified in US EPA reference document AP-42, Fifth Edition (revised 7/98), Section 1.4, Table 1.4-1.

## **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Space Heater (B004)

**Activity Description:** Natural Gas Heating and Ventilation System - 11.75 MM BTU/hr

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
11.75 mmBtu, natural gas space heater #2	OAC rule 3745-31-05(A)(3) (PTI #03-5042)	0.16 lb nitrogen oxides (NOx)/mmBtu of actual heat input  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10(B)(1) and OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	20 percent opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-17-10(B)(1)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input

##### 2. Additional Terms and Conditions

- Since natural gas is the only fuel fired in this emissions unit, no SO<sub>2</sub> emission limitation is established by OAC Chapter 3745-18 for this emissions unit.

##### II. Operational Restrictions

- The permittee shall burn only natural gas in this emissions unit.

##### III. Monitoring and/or Record Keeping Requirements

- For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

##### IV. Reporting Requirements

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

##### V. Testing Requirements

- Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):

## **V. Testing Requirements (continued)**

- 1.a** Emission Limitation:  
0.020 lb PE/mmBtu of actual heat input

**Applicable Compliance Method:**

The permittee may determine compliance with the limitation above by multiplying the emissions unit's maximum burning capacity of natural gas (11,750 cubic feet/hr) by the AP-42, Table 1.4-2 emission factor [1.9 lbs PE (filterable)/mmcu.ft.]\*, and then dividing by the emissions unit's maximum heat input capacity (11.75 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the limitation above in accordance with the methods specified in OAC 3745-17-03(B)(9).

\* This emission factor is specified in USEPA reference document AP-42, Fifth Edition (revised 7/98), Section 1.4, Table 1.4-2.

- 1.b** Emission Limitation:  
20 percent opacity, as a six-minute average, except as otherwise provided by rule

**Applicable Compliance Method:**

If required, the permittee shall demonstrate compliance with the visible emissions limitation above in accordance with the methods specified in OAC 3745-17-03(B)(1).

- 1.c** Emission Limitation:  
0.16 lb NO<sub>x</sub>/mmBtu of actual heat input

**Applicable Compliance Method:**

The permittee may determine compliance with this emission limitation based upon multiplying the emissions unit's maximum burning capacity of natural gas (11,750 cubic feet/hr) by the AP-42, Table 1.4-1 emission factor [100 lbs NO<sub>x</sub>/mmcu.ft.]\*, and then dividing by the emissions unit's maximum heat input capacity (11.75 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the limitation above pursuant to Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

\* This emission factor is specified in US EPA reference document AP-42, Fifth Edition (revised 7/98), Section 1.4, Table 1.4-1.

## **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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** Procoat 2000 Line A (K008)  
**Activity Description:** Coating line with oven and incinerator

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
procoat 2000 line A, with catalytic incinerator	OAC rule 3745-31-05(A)(3) (PTI #03-8656)	71.0 lbs volatile organic compounds (VOC)/day (from coatings usage)  4.4 lbs VOC/gallon of coating, as applied (uncontrolled)  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c).
	OAC rule 3745-21-09(U)(1)(c)	See A.2.a.  6.7 lbs VOC/gallon of coating solids, as applied (controlled)

##### 2. Additional Terms and Conditions

- 2.a The VOC emissions from this emissions unit shall be controlled through the application of a permanent total enclosure with a 100% capture efficiency and a catalytic incinerator with a minimum 95% destruction efficiency.

## II. Operational Restrictions

1. The coating line shall be equipped with a permanent total enclosure (PTE)\* which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
  - a. any "Natural Draft Opening" (NDO)\* shall be at least 4 equivalent diameters from each OC emission point;
  - b. the total area of all NDOs shall not exceed 5% of the surface area of the enclosure's four walls, floor and ceiling;
  - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water, and the direction of air through all NDOs shall be into the enclosure;
  - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
  - e. all OC emissions must be captured and vented to the OC control devices.

By satisfying the above criteria for a permanent total enclosure, the OC capture efficiency shall be assumed to be 100%.

\* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all OC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
3. The daily coating usage for this emissions unit shall not exceed 42.4 gallons.
4. The average temperature of the exhaust gases immediately before the catalyst bed, 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 (at each respective load scenario)\* that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test (at each respective load scenario)\* that demonstrated the emissions unit was in compliance.

\* This catalytic incinerator controls emissions units K008, K009, and K011. The average temperature difference across the catalyst bed will vary based on how many of the emissions units are using solvent based coatings simultaneously (1, 2, or 3 lines). For the purposes of this permit, the operation of 1, 2, and 3 lines will equate to low, medium, and high load respectively. Acceptable temperature ranges for the various loads will be established in accordance with the testing requirements in section A.V.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed 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 monitors and recorder(s) shall be installed, 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 each day:

- a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance during either low medium or high load.
  - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance during either low, medium, or high load.
  - c. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
  - d. All temperature records described above must also identify under what load scenario the measurement is being taken. (i.e. under low, medium or high load)
2. The permittee shall maintain and operate monitoring devices and a recorder that simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.

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

3. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification number for each coating employed, as applied.
  - b. The number of gallons of each coating employed.
  - c. The total number of gallons for all the coatings employed.
  - d. The VOC and coating solids contents of each coating employed, in lbs of VOC per gallon of coating, as applied, and in percent coating solids, by volume, as applied, respectively.
  - e. The total uncontrolled VOC emissions for all the coatings employed, i.e., the summation of (b x d) for all coatings, in pounds.
  - f. The total coating solids for all the coatings employed, i.e., the summation of (b x d) for all coatings, in gallons.
  - g. The total calculated controlled VOC emission rate for all the coatings employed, in pounds (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance, i.e., (e) multiplied by a factor of (1 - the overall control efficiency).
  - h. The calculated controlled VOC content of the coatings. i.e., (g/f), in pounds VOC/gallon of coating solids.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following :
  - a. all exceedances of the VOC content limitations (in pounds/gallon of coating and in pounds/gallon of coating solids);
  - b. all 3-hour blocks of time, when the emissions unit was in operation, during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed did not comply with the temperature restrictions specified above; and
  - c. all exceedances of the daily VOC emission limitation of 71 pounds and the daily coatings usage restriction of 42.4 gallons.
2. The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
3. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
4. The permittee shall submit 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.

## V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for the catalytic incinerator that emissions units K008, K009, and K011 are vented to in accordance with the following requirements:
  - a. Emission testing shall be conducted within 6 months after the issuance of this permit, and approximately 2.5 years prior to the expiration of this permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the mass emission rate for VOC and the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency and the catalytic incinerator destruction efficiency.
  - c. The test shall be conducted while the emissions unit is operating at or near its maximum capacity\*, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

\* These emission units operate under multiple load scenarios. The typically expected testing protocol would require the multiple load scenarios be tested on an alternate basis. (For example, if initial testing is performed under a low load scenario, the next scheduled testing will be performed under a medium or high load scenario).
  - d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for VOCs:
    - i. Method 25A of 40 CFR, Part 60, Appendix A.
    - ii. 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.
    - iii. The control efficiency of the catalytic incinerator 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 compounds between the inlet and outlet of the vapor control system.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

As part of the "Intent to Test" notification, the permittee shall submit information as to which load scenario will be tested.

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

## V. Testing Requirements (continued)

3. During any emission testing for this emissions unit, the permittee shall record the following additional information:
  - a. the average temperature of the exhaust gases immediately before the catalyst bed, in degrees Fahrenheit;
  - b. the average temperature difference across the catalyst bed, in degrees Fahrenheit; and
  - c. the minimum pressure differential established, in inches of water.
  - d. the number of lines using solvent based coatings (i.e. low, medium, or high load).
4. Compliance with the emission limitations/usage restrictions in section A.I of this permit shall be determined in accordance with the following methods:
  - 4.a Emissions Limitations:  
4.4 lbs VOC/gallon of coating  
6.7 lbs VOC/gallon of coating solids  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in section A.III.3 of this permit.
  - 4.b Emissions Limitation:  
71.0 lbs VOC/day  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in section A.III.3 of this permit and the results of emission testing conducted in accordance with the methods and procedures specified in section A.V.1 of this permit.
  - 4.c Emission Limitation-  
95% destruction efficiency for VOC  
  
Applicable Compliance Method-  
The permittee shall demonstrate compliance with the limitation above based on the results of emission testing conducted in accordance with the methods and procedures specified in section A.V.1 of this permit.
  - 4.d Coating Usage Restriction:  
42.4 gallons/day  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in section A.III.3 of this permit.
5. Any determination of VOC content (VOC means all the volatile organic compounds that are in a coating/cleanup material expressed in pounds of VOC per gallon of solids or per gallon of coating), solids content, or density of each coating shall be based on the coatings as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coatings, or from data determined by an analysis of each coating, as received by Reference Method 24. The Ohio EPA may require the company, if it used formulation data supplied by the manufacturer, to determine the VOC contents of the coatings by Reference Method 24.

## 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
procoat 2000 line A, with catalytic incinerator	none	none

**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**

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

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Procoat 2000 Line 2/B (K009)  
**Activity Description:** Coating line with oven and incinerator

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
procoat 2000 line B, with catalytic incinerator	OAC rule 3745-31-05(A)(3) (PTI #03-8104)	148.9 lbs volatile organic compounds (VOC)/day (from coatings usage)  4.4 lbs VOC/gallon of coating, as applied (uncontrolled)  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c).
	OAC rule 3745-21-09(U)(1)(c)	See A.2.a.  6.7 lbs VOC/gallon of coating solids, as applied (controlled)

##### 2. Additional Terms and Conditions

- 2.a The VOC emissions from this emissions unit shall be controlled through the application of a permanent total enclosure with a 100% capture efficiency and a catalytic incinerator with a minimum 95% destruction efficiency.

## II. Operational Restrictions

1. The coating line shall be equipped with a permanent total enclosure (PTE)\* which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
  - a. any "Natural Draft Opening" (NDO)\* shall be at least 4 equivalent diameters from each OC emission point;
  - b. the total area of all NDOs shall not exceed 5% of the surface area of the enclosure's four walls, floor and ceiling;
  - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water, and the direction of air through all NDOs shall be into the enclosure;
  - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
  - e. all OC emissions must be captured and vented to the OC control devices.

By satisfying the above criteria for a permanent total enclosure, the OC capture efficiency shall be assumed to be 100%.

\* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all OC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
3. The daily coating usage for this emissions unit shall not exceed 88.5 gallons.
4. The average temperature of the exhaust gases immediately before the catalyst bed, 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 (at each respective load scenario)\* that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test (at each respective load scenario)\* that demonstrated the emissions unit was in compliance.

\* This catalytic incinerator controls emissions units K008, K009, and K011. The average temperature difference across the catalyst bed will vary based on how many of the emissions units are using solvent based coatings simultaneously (1, 2, or 3 lines). For the purposes of this permit, the operation of 1, 2, and 3 lines will equate to low, medium, and high load respectively. Acceptable temperature ranges for the various loads will be established in accordance with the testing requirements in section A.V.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed 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 monitors and recorder(s) shall be installed, 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 each day:

- a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
  - c. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
2. The permittee shall maintain and operate monitoring devices and a recorder that simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.

3. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification number for each coating employed, as applied.
  - b. The number of gallons of each coating employed.
  - c. The total number of gallons for all the coatings employed.
  - d. The VOC and coating solids contents of each coating employed, in lbs of VOC per gallon of coating, as applied, and in percent coating solids, by volume, as applied, respectively.
  - e. The total uncontrolled VOC emissions for all the coatings employed, i.e., the summation of (b x d) for all coatings, in pounds.
  - f. The total coating solids for all the coatings employed, i.e., the summation of (b x d) for all coatings, in gallons.
  - g. The total calculated controlled VOC emission rate for all the coatings employed, in pounds (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance, i.e., (e) multiplied by a factor of (1 - the overall control efficiency).
  - h. The calculated controlled VOC content of the coatings. i.e., (g/f), in pounds VOC/gallon of coating solids.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following :
  - a. all exceedances of the VOC content limitations (in pounds/gallon of coating and in pounds/gallon of coating solids);
  - b. all 3-hour blocks of time, when the emissions unit was in operation, during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed did not comply with the temperature restrictions specified above; and
  - c. all exceedances of the daily VOC emission limitation of 148.9 pounds and the daily coatings usage restriction of 88.5 gallons.
2. The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
3. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
4. The permittee shall submit 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.

#### **V. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for the catalytic incinerator that emissions units K008, K009, and K011 are vented to in accordance with the following requirements:
  - a. Emission testing shall be conducted within 6 months after the issuance of this permit, and approximately 2.5 years prior to the expiration of this permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the mass emission rate for VOC and the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency and the catalytic incinerator destruction efficiency.
  - c. The test shall be conducted while the emissions unit is operating at or near its maximum capacity\*, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

\* These emission units operate under multiple load scenarios. The typically expected testing protocol would require the multiple load scenarios be tested on an alternate basis. (For example, if initial testing is performed under a low load scenario, the next scheduled testing will be performed under a medium or high load scenario).

## V. Testing Requirements (continued)

d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for VOCs:

i. Method 25A of 40 CFR, Part 60, Appendix A.

ii. 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.

iii. The control efficiency of the catalytic incinerator 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 compounds between the inlet and outlet of the vapor control system.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

As part of the "Intent to Test" notification, the permittee shall submit information as to which load scenario will be tested.

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

3. During any emission testing for this emissions unit, the permittee shall record the following additional information:
- a. the average temperature of the exhaust gases immediately before the catalyst bed, in degrees Fahrenheit;
  - b. the average temperature difference across the catalyst bed, in degrees Fahrenheit; and
  - c. the minimum pressure differential established, in inches of water.
  - d. the number of lines using solvent based coatings (i.e. low, medium, or high load).
4. Compliance with the emission limitations/usage restrictions in section A.I of this permit shall be determined in accordance with the following methods:

## **V. Testing Requirements (continued)**

- 4.a** Emissions Limitations:  
4.4 lbs VOC/gallon of coating  
6.7 lbs VOC/gallon of coating solids

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

- 4.b** Emissions Limitation:  
148.9 lbs VOC/day

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in section A.III.3 of this permit and the results of emission testing conducted in accordance with the methods and procedures specified in section A.V.1 of this permit.

- 4.c** Emission Limitation-  
95% destruction efficiency for VOC

Applicable Compliance Method-  
The permittee shall demonstrate compliance with the limitation above based on the results of emission testing conducted in accordance with the methods and procedures specified in section A.V.1 of this permit.

- 4.d** Coating Usage Restriction:  
88.5 gallons/day

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

- 5.** Any determination of VOC content (VOC means all the volatile organic compounds that are in a coating/cleanup material expressed in pounds of VOC per gallon of solids or per gallon of coating), solids content, or density of each coating shall be based on the coatings as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coatings, or from data determined by an analysis of each coating, as received by Reference Method 24. The Ohio EPA may require the company, if it used formulation data supplied by the manufacturer, to determine the VOC contents of the coatings by Reference Method 24.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
procoat 2000 line B, with catalytic incinerator	none	none

**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**

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

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Procoat Line C (K011)  
**Activity Description:** Coating line with oven and incinerator

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
procoat 2000 line C, with catalytic incinerator (emissions unit K011)	OAC rule 3745-31-05(A)(3) (PTI #03-13079)	0.82 lb volatile organic compounds (VOC)/hour (from coatings usage)  3.6 tons VOC/year (from coating usage)  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c).
	OAC rule 3745-21-09(U)(1)(c)	See A.2.a.  6.7 lbs VOC/gallon of coating solids, as applied (controlled)

##### 2. Additional Terms and Conditions

- 2.a The VOC emissions from this emissions unit shall be controlled through the application of a permanent total enclosure with a 100% capture efficiency and a catalytic incinerator with a minimum 95% destruction efficiency.

## II. Operational Restrictions

1. The coating line shall be equipped with a permanent total enclosure (PTE)\* which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
  - a. any "Natural Draft Opening" (NDO)\* shall be at least 4 equivalent diameters from each OC emission point;
  - b. the total area of all NDOs shall not exceed 5% of the surface area of the enclosure's four walls, floor and ceiling;
  - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.007 inch of water, and the direction of air through all NDOs shall be into the enclosure;
  - d. all access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation; and
  - e. all OC emissions must be captured and vented to the OC control devices.

By satisfying the above criteria for a permanent total enclosure, the OC capture efficiency shall be assumed to be 100%.

\* Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - a permanently installed enclosure that completely surrounds a source of emissions such that all OC emissions are captured and contained for discharge through a control device.

Natural Draft Opening (NDO) - any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
3. The average temperature of the exhaust gases immediately before the catalyst bed, 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 (at each respective load scenario)\* that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test (at each respective load scenario)\* that demonstrated the emissions unit was in compliance.

\* This catalytic incinerator controls emissions units K008, K009, and K011. The average temperature difference across the catalyst bed will vary based on how many of the emissions units are using solvent based coatings simultaneously (1, 2, or 3 lines). For the purposes of this permit, the operation of 1, 2, and 3 lines will equate to low, medium, and high load respectively. Acceptable temperature ranges for the various loads will be established in accordance with the testing requirements in section A.V.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed 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 monitors and recorder(s) shall be installed, 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 each day:

- a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
  - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
  - c. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
2. The permittee shall maintain and operate monitoring devices and a recorder that simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.

3. The permittee shall collect and record the following information each day for this emissions unit:
  - a. The name and identification number for each coating employed, as applied.
  - b. The number of gallons of each coating employed.
  - c. The total number of hours the emissions unit was in operation.
  - d. The VOC and coating solids contents of each coating employed, in lbs of VOC per gallon of coating, as applied, and in percent coating solids, by volume, as applied, respectively.
  - e. The total uncontrolled VOC emissions for all the coatings employed, i.e., the summation of (b x d) for all coatings, in pounds.
  - f. The total calculated controlled VOC emission rate for all the coatings employed, in pounds (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance, i.e., (e) multiplied by a factor of (1 - the overall control efficiency).
  - g. The average hourly VOC emission rate (f/c), in pounds (average).
  - h. The total coating solids for all the coatings employed, i.e., the summation of (b x d) for all coatings, in gallons
  - i. The calculated controlled VOC content of the coatings. i.e., (f/h), in pounds VOC/gallon of coating solids.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following :
  - a. all exceedances of the VOC content limitation (in pounds/gallon of coating solids);
  - b. all 3-hour blocks of time, when the emissions unit was in operation, during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed did not comply with the temperature restrictions specified above; and
  - c. all exceedances of the hourly VOC emission limitation of 0.82 pound.
2. The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
3. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
4. The permittee shall submit annual reports that summarize the actual annual VOC emissions for this emissions unit. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
5. The permittee shall submit 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.

#### **V. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for the catalytic incinerator that emissions units K008, K009, and K011 are vented to in accordance with the following requirements:
  - a. Emission testing shall be conducted within 6 months after the issuance of this permit, and approximately 2.5 years prior to the expiration of this permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the mass emission rate for VOC and the overall control system efficiency for VOCs, and shall include determinations of the capture efficiency and the catalytic incinerator destruction efficiency.
  - c. The test shall be conducted while the emissions unit is operating at or near its maximum capacity\*, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

\* These emission units operate under multiple load scenarios. The typically expected testing protocol would require the multiple load scenarios be tested on an alternate basis. (For example, if initial testing is performed under a low load scenario, the next scheduled testing will be performed under a medium or high load scenario).

## V. Testing Requirements (continued)

d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for VOCs:

i. Method 25A of 40 CFR, Part 60, Appendix A.

ii. 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.

iii. The control efficiency of the catalytic incinerator 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 compounds between the inlet and outlet of the vapor control system.

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

As part of the "Intent to Test" notification, the permittee shall submit information as to which load scenario will be tested.

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

3. During any emission testing for this emissions unit, the permittee shall record the following additional information:
- a. the average temperature of the exhaust gases immediately before the catalyst bed, in degrees Fahrenheit;
  - b. the average temperature difference across the catalyst bed, in degrees Fahrenheit; and
  - c. the minimum pressure differential established, in inches of water.
  - d. the number of lines using solvent based coatings (i.e. low, medium, or high load).
4. Compliance with the emission limitations/usage restrictions in section A.I of this permit shall be determined in accordance with the following methods:
- 4.a Emissions Limitation:  
6.7 lbs VOC/gallon of coating solids

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

## **V. Testing Requirements (continued)**

- 4.b** Emissions Limitation:  
0.82 lb VOC/hour

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.3 of this permit and the results of emission testing conducted in accordance with the methods and procedures specified in section A.V.1 of this permit.

- 4.c** Emission Limitation-  
95% destruction efficiency for VOC

Applicable Compliance Method-

The permittee shall demonstrate compliance with the limitation above based upon the results of emission testing conducted in accordance with the methods and procedures specified in section A.V.1 of this permit.

- 4.d** Emissions Limitation:  
3.6 tons VOC/year

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.3 of this permit and shall be the summation of the daily VOC emission rates for the calendar year.

- 5.** Any determination of VOC content (VOC means all the volatile organic compounds that are in a coating/cleanup material expressed in pounds of VOC per gallon of solids or per gallon of coating), solids content, or density of each coating shall be based on the coatings as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coatings, or from data determined by an analysis of each coating, as received by Reference Method 24. The Ohio EPA may require the company, if it used formulation data supplied by the manufacturer, to determine the VOC contents of the coatings by Reference Method 24.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
procoat 2000 line C, with catalytic incinerator (emissions unit K011)	none	none

**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**

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

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** #1 Braze Furnace (P020)  
**Activity Description:** Electric resistance brazing furnace - Inline Braze Process

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
braze furnace #1	OAC rule 3745-17-11 (B)	none (See A.1.2.a.)
	OAC rule 3745-17-07 (A)	none (See A.1.2.b.)
	OAC rule 3745-21-07(G)	none (See A.1.2.c.)

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.
- 2.b 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 is not applicable.
- 2.c OAC rule 3745-21-07(G) is not applicable because the facility is not located in a "Priority 1" county and the emissions unit was installed prior to February 15, 1972.

##### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** #2 Braze Furnace (P021)  
**Activity Description:** Electric resistance brazing furnace - Inline Braze Process

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
braze furnace #2	OAC rule 3745-17-11 (B)	none (See A.1.2.a.)
	OAC rule 3745-17-07 (A)	none (See A.1.2.b.)
	OAC rule 3745-21-07(G)	none (See A.1.2.c.)

**2. Additional Terms and Conditions**

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.
- 2.b 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 is not applicable.
- 2.c OAC rule 3745-21-07(G) is not applicable because the facility is not located in a "Priority 1" county and the emissions unit was installed prior to February 15, 1972.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** #3 Braze Furnace (P022)  
**Activity Description:** Electric resistance brazing furnace - Inline Braze Process

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
braze furnace #3	OAC rule 3745-17-11 (B)	none (See A.1.2.a.)
	OAC rule 3745-17-07 (A)	none (See A.1.2.b.)
	OAC rule 3745-21-07(G)	none (See A.1.2.c.)

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.
- 2.b 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 is not applicable.
- 2.c OAC rule 3745-21-07(G) is not applicable because the facility is not located in a "Priority 1" county and the emissions unit was installed prior to February 15, 1972.

##### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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:** #4 Braze Furnace (P023)  
**Activity Description:** Electric resistance brazing furnace - Inline Braze Process

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
braze furnace #4	OAC rule 3745-17-11 (B)	none (See A.1.2.a.)
	OAC rule 3745-17-07 (A)	none (See A.1.2.b.)
	OAC rule 3745-21-07(G)	none (See A.1.2.c.)

**2. Additional Terms and Conditions**

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.
- 2.b 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 is not applicable.
- 2.c OAC rule 3745-21-07(G) is not applicable because the facility is not located in a "Priority 1" county and the emissions unit was installed prior to February 15, 1972.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**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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