



Environmental
Protection Agency

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

11/15/2010

Pamela Blakley *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Aleris Rolled Products, Inc.
Facility ID: 0165000045
Permit Type: Renewal
Permit Number: P0083815

Dear Ms. Blakley:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.ohio.gov/dapc> in Microsoft Word and Adobe Acrobat format. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

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

Cc: Ohio EPA DAPC, Central District Office



PROPOSED

Division of Air Pollution Control Title V Permit for Aleris Rolled Products, Inc.

Facility ID: 0165000045
Permit Number: P0083815
Permit Type: Renewal
Issued: 11/15/2010
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Aleris Rolled Products, Inc.

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Authorization

Facility ID: 0165000045
Facility Description: Architectural metal work
Application Number(s): A0014230, A0014231, A0014232, A0014233
Permit Number: P0083815
Permit Description: Two metal coil coating lines controlled by a thermal oxidizer, and a paint mixing room.
Permit Type: Renewal
Issue Date: 11/15/2010
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0083814

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Aleris Rolled Products, Inc.
1 REYNOLDS ROAD
Ashville, OH 43103-0197

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

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. 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. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Central District Office. 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, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

(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:

- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Effective Date: To be entered upon final issuance

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 OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) 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. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

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

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

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These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

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

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

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



Effective Date: To be entered upon final issuance

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) 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))

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Central District Office.

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

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

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

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

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

5. 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))

6. 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))

7. 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 Standard Term and Condition A.11 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.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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))

9. 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))

10. 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 standard terms and conditions shall apply to all operating scenarios authorized in this permit.

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

11. 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))

12. 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))

13. 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:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- 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:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

- (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- 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:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - (2) 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.
 - (3) 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))

14. 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))

15. 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))

16. 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))

17. 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 emissions 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.

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

18. 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.)

19. Insignificant Activities or Emissions Levels

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

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

20. 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))

21. 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))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

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.

26. 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.

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

27. 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).

28. 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.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

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1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) 6 and 7
2. The following emissions units contained in this permit are subject to MACT Subpart SSSS: K001 and K002. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA, Central District Office (OEPA-CDO).
3. The following emissions units contained in this permit are subject to NSPS Subpart TT: K001 and K002. The complete NSPS requirements may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA, Central District Office (OEPA-CDO).
4. All asbestos renovation and demolition activities conducted at this facility shall be performed in accordance with the applicable requirements specified in 40 CFR Part 61 Subpart M and OAC Chapter 3745-20.
5. The following insignificant emissions units are located at this facility:
 - a) B007 - Strip Paint Line Boiler;
 - b) B011 - Diesel Engines;
6. 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 the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.
7. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:
 - a) F202 - Roadways;
 - b) F203 - Cooling Tower;
 - c) B001 - 16 Plant Space Heaters;
 - d) B008 - Boiler - Fire Protection System 1;
 - e) B009 - Boiler - Fire Protection System 2;
 - f) B010 - Wet Cooling Section Burners;
 - g) P002 - 3 Stage Pretreat;
 - h) P201 - Table Saw;
 - i) L201 - Main Facility Area Parts Washer;



- j) L202 - Mixing Room Parts Washers;
- k) P006 - SPL Roll Grinder;
- l) P009 - SPL Laboratory;
- m) T013 - KLEEN 4060 (Bulk Tank);
- n) T014 - Bulk Tank A;
- o) T015 - Bulk Tank B;
- p) T016 - Bulk Tank C;
- q) T017 - Bulk Tank D;
- r) K003 - Ink Jet Printers;
- s) P301 - Roll Forming Line #1;
- t) P302 - Roll Forming Line #2;
- u) P303 - Roll Forming Line #3;
- v) P304 - Roll Forming Line #4;
- w) P311 - Roll Forming Line #11;
- x) P312 - Roll Forming Line #12;
- y) P313 - Roll Forming Line #13;
- z) P314 - Roll Forming Line #14;
- aa) P321 - Roll Forming Line #21;
- bb) P322 - Roll Forming Line #22;
- cc) P323 - Roll Forming Line #23;
- dd) P331 - Roll Forming Line #31;
- ee) P333 - Roll Forming Line #33;
- ff) P334 - Roll Forming Line #34;
- gg) P337 - Roll Forming Line #37;
- hh) P338 - Roll Forming Line #38;
- ii) P339 - Roll Forming Line #39;
- jj) P341 - Roll Forming Line #41;



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- kk) P342 - Roll Forming Line #42;
- ll) P343 - Roll Forming Line #43;
- mm) P351 - Roll Forming Line #51;
- nn) P352 - Roll Forming Line #52;
- oo) P353 - Roll Forming Line #53;
- pp) P354 - Roll Forming Line #54;
- qq) P361 - Roll Forming Line #61;
- rr) P330 - Roll Forming Line #30;
- ss) P332 - Roll Forming Line #32;
- tt) P340 - Roll Forming Line #40;
- uu) P344 - Roll Forming Line #44;
- vv) P355 - Roll Forming Line #55;
- ww) P356 - Roll Forming Line #56;
- xx) P362 - Roll Forming Line #62; and
- yy) P363 - Roll Forming Line #63

C. Emissions Unit Terms and Conditions



1. K001, COIL PRIMER COATING LINE

Operations, Property and/or Equipment Description:

AUTOMATIC PRIME COIL COATING PROCESS

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|--|
| a. | OAC rule 3745-31-05(A) (PTI # 01-08785) | <p>Emissions from Coating Operations:</p> <p>Volatile organic compound (VOC) emissions from the coating operation, including solvent cleanup activities shall not exceed 21.3 tons per year.</p> <p>Particulate emissions (PE) from the oven natural gas combustion shall not exceed 0.04 pound per hour and 0.2 ton per year.</p> <p>Nitrogen oxide (NO_x) emissions from the oven natural gas combustion shall not exceed 0.6 pound per hour and 2.6 ton per year.</p> <p>Sulfur dioxide (SO₂) emissions from the oven natural gas combustion shall not exceed 0.004 pound per hour and 0.02 ton per year.</p> <p>Carbon monoxide (CO) emissions from the oven natural gas combustion shall not exceed 0.5 pound per hour and 2.2 tons per year.</p> <p>Organic compound (OC) emissions from the oven natural gas combustion shall not exceed 0.03 pound per hour and 0.14 ton per year.</p> |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|--|
| | | <p>Emissions from Thermal Oxidizer Natural Gas Combustion:</p> <p>PE from natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.07 pound per hour and 0.33 ton per year.</p> <p>NO_x emissions from natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.98 pound per hour and 4.29 tons per year.</p> <p>SO₂ emissions from natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.01 pound per hour and 0.03 ton per year.</p> <p>CO emissions from natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.82 pounds per hour and 3.61 tons per year.</p> <p>OC emissions from natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.05 pound per hour and 0.24 ton per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(E), 40 CFR Part 63, Subpart SSSS, 40 CFR 60 Subpart TT and OAC rule 3745-17-07(A).</p> <p>See b)(2)a and b)(2)e.</p> |
| b. | OAC rule 3745-17-07(A) | Visible particulate emissions from thermal oxidizer stack shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A). |
| c. | OAC rule 3745-21-09(E) | VOC emissions shall not exceed 4.0 lbs/gallon of solids when using the thermal oxidizer. |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|---|--|
| | | See b)(2)b.. |
| d. | <p>40 CFR Part 60, Subpart TT (40 CFR 60.460 - 466)</p> <p>[In accordance with 40 CFR 60.460(a) and (b) this emissions unit is a metal coil coating line at an existing surface coating facility subject to the emissions limitations and control measures specified in this section]</p> | <p>Compliance Option A:</p> <p>VOC emissions shall not exceed 0.14 kg/liter (1.17 lbs/gal) of coating solids applied for each calendar month with the use of the thermal oxidizer</p> <p>or</p> <p>Compliance Option B:</p> <p>VOC emissions (stack and fugitive) shall not exceed 10 percent of the VOCs applied for each calendar month (90 percent reduction with the use of the thermal oxidizer).</p> <p>See b)(2)c and b)(2)f.</p> |
| e. | <p>40 CFR Part 63, Subpart SSSS (40 CFR 63.5080 - 5209)</p> <p>[In accordance with 40 CFR 63.5090(a), this emissions unit is a metal coil coating line at an existing surface coating facility subject to the emissions limitations and control measures specified in this section]</p> | <p>Compliance Option A:</p> <p>Organic HAP emissions shall not exceed 0.046 kg/liter (0.38 lbs/gallon) of solids applied during each rolling 12-month compliance period with the use of the thermal oxidizer.</p> <p>or</p> <p>Compliance Option B:</p> <p>Organic HAP emissions (stack and fugitive) shall not exceed 2 percent of the organic HAP applied during each rolling 12-month compliance period (98 percent reduction).</p> <p>See b)(2)d and b)(2)f.</p> |
| f. | <p>40 CFR 63.1 - 16 (40 CFR 63.5140(b))</p> | <p>Table 2 to Subpart SSSS of 40 CFR Part 63 - Applicability of General Provisions to Subpart SSSS shows which parts of the General Provisions in 40 CFR 63.1 - 16 apply.</p> |

(2) Additional Terms and Conditions

- a. The permittee shall demonstrate compliance with the annual VOC emission limit on a 12-month rolling average basis. The annual limit, which is equivalent to 98 percent reduction based on the coating operations uncontrolled potential to emit, may be complied with through a combination of low-VOC content coatings and/or thermal incineration.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart SSSS.]

- b. Pursuant to OAC rule 3745-21-09(B)(6), the 81 percent overall capture and control and 90 percent destruction efficiency option is available in lieu of complying with the 4.0 lbs/gallon solids emission limitation contained in OAC rule 3745-21-09(E).

[Authority for Term: OAC rule 3745-77-07(C)(1).]

- c. Compliance with the VOC emission limitations established pursuant to 40 CFR Part 60, Subpart TT shall be demonstrated on a calendar month basis using all coating materials applied in this emissions unit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart TT.]

- d. Compliance with the organic HAP emission limits established pursuant to 40 CFR Part 63, Subpart SSSS shall be demonstrated on a 12-month rolling average basis using all materials applied in this emissions unit or the permittee shall limit total organic HAP emissions, to no more than 2 percent of the HAP applied for each month during each 12-month compliance period (98 percent reduction).

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart SSSS]

- e. The hourly and annual emission limitations from natural gas combustion in the coating process oven and thermal oxidizer were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

- f. The permittee shall elect to use one of the following combinations of Compliance Options from 40 CFR Part 60, Subpart TT and 40 CFR Part 63, Subpart SSSS to on a monthly basis:

- i. Compliance Option A for 40 CFR Part 60, Subpart TT; along with either:

(a) Compliance Option A for 40 CFR Part 63, Subpart SSSS; or

(b) Compliance Option B for 40 CFR Part 63, Subpart SSSS.



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- ii. Compliance Option B for 40 CFR Part 60, Subpart TT; along with either:
 - (a) Compliance Option A for 40 CFR Part 63, Subpart SSSS; or
 - (b) Compliance Option B for 40 CFR Part 63, Subpart SSSS.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart TT and 40 CFR Part 63, Subpart SSSS]

c) Operational Restrictions

- (1) See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080 - 5209)
- (2) See 40 CFR Part 60, Subpart TT (40 CFR 60.460 - 466)

d) Monitoring and/or Recordkeeping Requirements

- (1) See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080 - 5209) and Table I to 40 CFR Part 63, Subpart SSSS
- (2) See 40 CFR Part 60, Subpart TT (40 CFR 60.460 - 466).
- (3) The emission capture system shall be maintained under negative pressure whenever the emissions unit is in operation and all emissions shall be vented to the regenerative thermal oxidizer.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) For purposes of determining compliance with requirements in both OAC rules 3745-21-09(B)(3)(j) and (E), the permittee, when showing compliance with the VOC emissions limitation of 4.0 pounds per gallon of solids with the use of the thermal oxidizer, shall collect and record the following information for each day for emissions unit K001 and thermal oxidizer:
 - a. The name and identification of each coating, as applied;
 - b. The mass of VOC per gallon of coating solids, as applied and the solids content per gallon, as applied, and the volume, as applied, of each coating;
 - c. The maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
 - d. The calculated controlled VOC emissions rate from coatings, in pounds of OC per gallon of coating solids, as applied;
 - e. The controlled VOC emissions rate from coatings shall be calculated using:
 - i. the overall control efficiency as determined during the most recent emissions test that demonstrated that the emissions unit was in compliance; and (ii) or (iii) below:

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- ii. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied); or
 - iii. the daily volume-weighted VOC per gallon of coating solids, as applied, recorded in d)(4)c above.
- f. A log or record of operating time for the capture system, control device, monitoring equipment, and associated emissions unit; and
- g. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) For purposes of compliance with the requirements of OAC rule 3745-21-09(E) pursuant to OAC rule 3745-21-09(B)(6), the permittee shall collect and record the following information each day for the thermal oxidizer:
- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent compliance test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (6) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in permit to install # 01 - 08785 issued on October 19, 2006: section d)(4). The monitoring and record keeping requirements contained in the above-referenced permit to install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recorded keeping requirements in the permit to install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

- (7) The permittee shall collect and record the following information on a monthly basis:
- a. the name and identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material, in fraction by weight;
 - d. the density of each VOC containing cleanup solvent used, in pounds per gallon;

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- e. the calculated, controlled VOC emission rate from all cleanup materials, in pounds or tons; and
- f. the total volume of solids from all the coatings employed, in gallons.
- g. the total VOC emissions from all the coatings employed (i.e., the calculated, controlled VOC emission rate times the total volume of solids from all coatings employed in the line), in pounds or tons; and
- h. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080 - 5209)
- (2) See 40 CFR Part 60, Subpart TT (40 CFR 60.460 - 466).
- (3) The permittee shall notify Ohio EPA Central District Office in writing of any daily record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation. This notification shall include a copy of such record and shall be sent to Ohio EPA Central District Office no later than 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit quarterly summaries of the following records:
 - a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.

These quarterly summaries shall be submitted by April 30, July 31, October 31 and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit. Annual emission reports may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

- a. Emissions Limitation: PE from oven natural gas combustion shall not exceed 0.04 pound per hour and 0.2 ton per year. PE from the natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.07 pound per hour and 0.33 ton per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for total PE in natural gas combustion (7.6 lbs of PE /MM ft³).

The maximum capacity of the oven is 5,882 ft³/hr and 51,529,400 ft³/yr.

The maximum capacity of the thermal oxidizer is 9,804 ft³/hr and 85,882,400 ft³/yr.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and 202.

[Authority for term: OAC rule 3745-77-07(C)(1)) and 3745-31-05(A)(3)]

- b. Emissions Limitation: NO_x emissions from the oven natural gas combustion shall not exceed 0.6 pound per hour and 2.6 ton per year. NO_x emissions from natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.98 pound per hour and 4.29 tons per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-1 (7/98) for uncontrolled NO_x in natural gas combustion (100 lbs of NO_x/MMft³).

The maximum capacity of the oven is 5,882 ft³/hr and 51,529,400 ft³/yr.

The maximum capacity of the thermal oxidizer is 9,804 ft³/hr and 85,882,400 ft³/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

[Authority for term: OAC rule 3745-77-07(C)(1)) and 3745-31-05(A)(3)]

- c. Emission Limitation: SO₂ emissions from the oven natural gas combustion shall not exceed 0.004 pound per hour and 0.02 ton per year. SO₂ emissions from

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natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.01 pound per hour and 0.03 ton per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for SO₂ in natural gas combustion (0.6 lb of SO₂/MMft³).

The maximum capacity of the oven is 5,882 ft³/hr and 51,529,400 ft³/yr.

The maximum capacity of the thermal oxidizer is 9,804 ft³/hr and 85,882,400 ft³/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

[Authority for term: OAC rule 3745-77-07(C)(1)) and 3745-31-05(A)(3)]

- d. Emission Limitation: CO emissions from the oven natural gas combustion shall not exceed 0.5 pound per hour and 2.2 tons per year. CO emissions from natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.82 pounds per hour and 3.61 tons per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-1 (7/98) for CO in natural gas combustion (84 lbs of CO/MMft³).

The maximum capacity of the oven is 5,882 ft³/hr and 51,529,400 ft³/yr.

The maximum capacity of the thermal oxidizer is 9,804 ft³/hr and 85,882,400 ft³/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

[Authority for term: OAC rule 3745-77-07(C)(1)) and 3745-31-05(A)(3)]

- e. Emission Limitation: OC emissions from the oven natural gas combustion shall not exceed 0.03 pound per hour and 0.14 ton per year. OC emissions from natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.05 pound per hour and 0.24 ton per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for volatile organic compounds (VOC) in natural gas combustion (5.5 lbs of VOC/MMft³).

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The maximum capacity of the oven is 5,882 ft³/hr and 51,529,400 ft³/yr.

The maximum capacity of the thermal oxidizer is 9,804 ft³/hr and 85,882,400 ft³/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

[Authority for term: OAC rule 3745-77-07(C)(1)) and 3745-31-05(A)(3)]

- f. Emission Limitation: Visible particulate emissions from thermal incinerator stack shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)) and 3745-31-05(A)(3)]

- g. Emission Limitation: VOC emissions from the coating operation, including solvent cleanup activities, shall not exceed 21.3 tons per year.

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the sum total of VOC emissions from the coating operations and solvent cleanup activities. VOC emissions from coating operations are determined by summing the results of the 12 previous recent monthly calculations required pursuant to d) and multiplying the results of that summation by the overall VOC control efficiency, as determined by the most recent performance test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- h. Emission Limitation:

Option A: VOC emissions shall not exceed 0.14 kg/liter (1.17 lbs/gallon) of coating solids.

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to d) and the performance testing required by f)(2) and f)(3).

[Authority for term: 40 CFR Part 60, Subpart TT]

OR

Option B: VOC emissions shall not exceed 10 percent of the VOC's applied for each calendar month (90 percent reduction).

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Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to sections d) and the performance testing required by f)(2) and f)(3).

[Authority for term: 40 CFR Part 60, Subpart TT]

i. Emission Limitation:

Option A: The permittee shall limit organic HAP emissions to no more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction).

Applicable Compliance Method: Calculation of the overall organic HAP control efficiency, R, shall be achieved in accordance with 40 CFR 63.5170, Equation 7 and the performance testing required by f)(2) and f)(3).

[Authority for term: 40 CFR Part 63, Subpart SSSS]

OR

Option B: The permittee shall limit organic HAP emissions to no more than 0.046 kg/liter (0.38 lbs/gallon) of solids applied during each 12-month compliance period.

Applicable Compliance Method: Calculation of the organic HAP emitted during the month, for each calendar month, using Equation 8 of 40 CFR 63.5170 and the performance testing required by f)(2) and f)(3).

[Authority for term: 40 CFR Part 60, Subpart SSSS]

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. Consistent with U.S. EPA streamlining policy, the permittee may elect upon approval of Ohio EPA to utilize the applicable performance test methods and procedures per 40 CFR Part 63, Subpart SSSS in lieu of the performance test methods and procedures contained in 40 CFR Part 60, Subpart TT. Subpart SSSS performance test methods and procedures are generally more stringent than the performance test methods and procedures of Subpart TT
 - b. The emission testing shall be conducted within 2 years from issuance of this permit
 - c. The test(s) shall be conducted while the emissions units are operating at or near the maximum capacities for collected emissions from emissions units K001 and K002, unless otherwise specified or approved by the Ohio EPA, Central District Office.
 - d. The permittee shall conduct a performance test for each capture and control system to determine the destruction or removal efficiency of each control device according to 40 CFR 63.5160(d) as described in section f)(2)h., and the capture efficiency of each capture system according to 40 CFR 63.5160(e) as described

in f)(2)i, while burning natural gas in the curing ovens and collecting emissions from these emissions units (K001 and K002).

- e. The permittee shall determine the organic HAP weight fraction of each coating material applied by following one of the following procedures:
- i. the permittee may determine the coating material organic HAP content in accordance with U.S. EPA Method 311 of appendix A of 40 CFR 63. U.S. EPA Method 311 determination may be performed by the manufacturer of the material and the results provided to the permittee. The organic HAP content shall be calculated according to the following criteria and procedures:
 - (a) count only those organic HAP that are measured to be present at greater than or equal to 0.1 weight percent for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and greater than or equal to 1.0 weight percent for other organic HAP compounds;
 - (b) express the weight fraction of each organic HAP counted according to subparagraph (2). of this section as a value truncated to four places after the decimal point (for example, 0.3791); and
 - (c) calculate the total weight fraction of organic HAP in the tested material by summing the counted individual organic HAP weight fractions and truncating the result to three places after the decimal point (for example, 0.763);
 - ii. the permittee may determine the total volatile matter content of a coating as weight fraction of nonaqueous volatile matter and use it as a substitute for organic HAP, using U.S. EPA Method 24 of 40 CFR 60, appendix A. The U.S. EPA Method 24 determination may be performed by the manufacturer of the coating and the results provided to the permittee;
 - iii. the permittee may use an alternative test method for determining the organic HAP weight fraction of a coating once the Administrator has approved it. The permittee shall follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval; and
 - iv. the permittee may use coating formulation data provided that the information represents each organic HAP present at a level equal to or greater than 0.1 percent for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and equal to or greater than 1.0 percent for other organic HAP compounds in any raw material used, weighted by the mass fraction of each raw material used in the material. Coating formulation data may be provided by the manufacturer of the coating material.

In the event of any inconsistency between test data obtained with the test methods specified in paragraphs (i) through (iii) of f)(2)e and formulation data, the test data will govern.

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- f. The permittee shall determine the VOC weight fraction of each coating material applied using U.S. EPA Method 24. For coatings, the permittee may determine the total volatile matter content as weight fraction of nonaqueous volatile matter using U.S. EPA Method 24 of 40 CFR 60, appendix A. The U.S. Method 24 determination may be performed by the manufacturer of the coating and the results provided to the permittee. Results of U.S. EPA Method 24 testing on water-borne coatings shall be adjusted as described in section 12.6 of U.S. EPA Method 24.
- g. The permittee shall determine the solids content of each coating material applied. The permittee may determine the volume solids content using ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 (incorporated by reference, see 40 CFR 63.14), or an EPA approved alternative method. The ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 determination may be performed by the manufacturer of the material and the results provided to the permittee. Alternatively, the permittee may rely on formulation data provided by material providers to determine the volume solids.
- h. The permittee shall conduct a performance test to establish the destruction or removal efficiency of the control device or the outlet VOC concentration achieved by the oxidizer, according to the methods and procedures in U.S. EPA Methods 1 through 4 and 25 or 25A, 40 CFR Part 60, Appendix A or U.S. EPA Method 320, 40 CFR Part 63. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- i. The permittee shall determine the capture efficiency of the enclosure on the coating operation by one of the following procedures:
- i. for an enclosure that meets the criteria for a PTE, the permittee may assume it achieves 100 percent capture efficiency. The permittee must confirm that the capture system is a PTE by demonstrating that it meets the requirements of section 6 of U.S. EPA Method 204 of 40 CFR 51, Appendix M (or a U.S. EPA-approved alternative method), and that all exhaust gases from the enclosure are delivered to a control device;
 - ii. the permittee may determine capture efficiency (CE) according to the protocols for testing with temporary total enclosures that are specified in U.S. EPA Methods 204A through F of 40 CFR 51, Appendix M. The permittee may exclude never-controlled work stations from such capture efficiency determinations; and
 - iii. as an alternative to the procedures specified in paragraphs f)(2)i.i. and f)(2)i.ii., if a capture efficiency test is required, the permittee may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective or the Lower Confidence Limit approach as described in Appendix A to 40 CFR 63, Subpart KK. The permittee may exclude never-controlled work stations from such capture efficiency determinations.

During the performance test specified in paragraph f)(2)h of this section, the permittee shall monitor and record the combustion temperature at

least once every 15 minutes during each of the three test runs. The permittee shall monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.

The permittee shall use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test.

This average combustion temperature is the minimum operating limit for the thermal oxidizer for purposes of 40 CFR Part 63, Subpart SSSS.

This average combustion temperature minus 50 degrees Fahrenheit is the minimum operating limit for the thermal oxidizer for purposes of 40 CFR Part 60, Subpart TT.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

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

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) **Miscellaneous Requirements**

- (1) None.



2. K002, COIL FINISH COATING LINE

Operations, Property and/or Equipment Description:

AUTOMATIC FINISH COIL COATING PROCESS

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|--|
| a. | OAC rule 3745-31-05(A) (PTI # 01-08785) | <p>Emissions from Coating Operations:</p> <p>Volatile organic compound (VOC) emissions from the coating operation, including solvent cleanup activities shall not exceed 45.7 tons per year.</p> <p>Particulate emissions (PE) from the oven natural gas combustion shall not exceed 0.06 pound per hour and 0.26 ton per year.</p> <p>Nitrogen oxide (NO_x) emissions from the oven natural gas combustion shall not exceed 0.78 pound per hour and 3.44 ton per year.</p> <p>Sulfur dioxide (SO₂) emissions from the oven natural gas combustion shall not exceed 0.01 pound per hour and 0.02 ton per year.</p> <p>Carbon monoxide (CO) emissions from the oven natural gas combustion shall not exceed 0.66 pound per hour and 2.89 tons per year.</p> <p>Organic compound (OC) emissions from the oven natural gas combustion shall not exceed 0.04 pound per hour and 0.19 ton</p> |



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| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|--|
| | | <p>per year.</p> <p>Emissions from Thermal Oxidizer Natural Gas Combustion:</p> <p>PE from natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.07 pound per hour and 0.33 ton per year.</p> <p>NO_x emissions from natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.98 pound per hour and 4.29 tons per year.</p> <p>SO₂ emissions from natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.01 pound per hour and 0.03 ton per year.</p> <p>CO emissions from natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.82 pounds per hour and 3.61 tons per year.</p> <p>OC emissions from natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.05 pound per hour and 0.24 ton per year.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(E), 40 CFR Part 63, Subpart SSSS, 40 CFR 60 Subpart TT and OAC rule 3745-17-07(A).</p> <p>See b)(2)a and b)(2)e</p> |
| b. | OAC rule 3745-17-07(A) | Visible particulate emissions from thermal oxidizer stack shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A). |
| c. | OAC rule 3745-21-09(E) | VOC emissions shall not exceed 4.0 lbs/gallon of solids when using the |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|---|--|
| | | thermal oxidizer. See b)(2)b. |
| d. | 40 CFR Part 60, Subpart TT (40 CFR 60.460 - 466) [In accordance with 40 CFR 60.460(a) and (b) this emissions unit is a metal coil coating line at an existing surface coating facility subject to the emissions limitations and control measures specified in this section] | Compliance Option A: VOC emissions shall not exceed 0.14 kg/liter (1.17 lbs/gal) of coating solids applied for each calendar month with the use of the thermal oxidizer or Compliance Option B: VOC emissions (stack and fugitive) shall not exceed 10 percent of the VOCs applied for each calendar month (90 percent reduction with the use of the thermal oxidizer). See b)(2)c and b)(2)f. |
| e. | 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080 - 5209) [In accordance with 40 CFR 63.5090(a), this emissions unit is a metal coil coating line at an existing surface coating facility subject to the emissions limitations and control measures specified in this section] | Compliance Option A: Organic HAP emissions shall not exceed 0.046 kg/liter (0.38 lbs/gallon) of solids applied during each rolling 12-month compliance period with the use of the thermal oxidizer. or Compliance Option B: Organic HAP emissions (stack and fugitive) shall not exceed 2 percent of the organic HAP applied during each rolling 12-month compliance period (98 percent reduction). See b)(2)d and b)(2)f |
| f. | 40 CFR 63.1 - 16 (40 CFR 63.5140(b)) | Table 2 to Subpart SSSS of 40 CFR Part 63 - Applicability of General Provisions to Subpart SSSS shows which parts of the General Provisions in 40 CFR 63.1 - 16 apply. |

(2) Additional Terms and Conditions

- a. The permittee shall demonstrate compliance with the annual VOC emission limit on a 12-month rolling average basis. The annual limit, which is equivalent to 98 percent reduction based on the coating operations uncontrolled potential to emit, may be complied with through a combination of low-VOC content coatings and/or thermal incineration.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart SSSS.]

- b. Pursuant to OAC rule 3745-21-09(B)(6), the 81 percent overall capture and control and 90 percent destruction efficiency option is available in lieu of complying with the 4.0 lbs/gallon solids emission limitation contained in OAC rule 3745-21-09(E).

[Authority for Term: OAC rule 3745-77-07(C)(1).]

- c. Compliance with the VOC emission limitations established pursuant to 40 CFR Part 60, Subpart TT shall be demonstrated on a calendar month basis using all coating materials applied in this emissions unit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60, Subpart TT.]

- d. Compliance with the organic HAP emission limits established pursuant to 40 CFR Part 63, Subpart SSSS shall be demonstrated on a 12-month rolling average basis using all materials applied in this emissions unit or the permittee shall limit total organic HAP emissions, to no more than 2 percent of the HAP applied for each month during each 12-month compliance period (98 percent reduction).

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart SSSS.]

- e. The hourly and annual emission limitations from natural gas combustion in the coating process oven and thermal oxidizer were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

[Authority for Term: OAC rule 3745-77-07(C)(1).]

- f. The permittee shall elect to use one of the following combinations of Compliance Options from 40 CFR Part 60, Subpart TT and 40 CFR Part 63, Subpart SSSS to on a monthly basis:

- i. Compliance Option A for 40 CFR Part 60, Subpart TT; along with either:

(a) Compliance Option A for 40 CFR Part 63, Subpart SSSS; or

(b) Compliance Option B for 40 CFR Part 63, Subpart SSSS.

- ii. Compliance Option B for 40 CFR Part 60, Subpart TT; along with either:
 - (a) Compliance Option A for 40 CFR Part 63, Subpart SSSS; or
 - (b) Compliance Option B for 40 CFR Part 63, Subpart SSSS.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart TT and 40 CFR Part 63, Subpart SSSS].

c) Operational Restrictions

- (1) See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080 - 5209)
- (2) See 40 CFR Part 60, Subpart TT (40 CFR 60.460 - 466)

d) Monitoring and/or Recordkeeping Requirements

- (1) See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080 - 5209) and Table I to 40 CFR Part 63, Subpart SSSS
- (2) See 40 CFR Part 60, Subpart TT (40 CFR 60.460 - 466).
- (3) The emission capture system shall be maintained under negative pressure whenever the emissions unit is in operation and all captured emissions shall be vented to the regenerative thermal oxidizer.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) For purposes of determining compliance with requirements in both OAC rules 3745-21-09(B)(3)(j) and (E), the permittee, when showing compliance with the VOC emissions limitation of 4.0 pounds per gallon of solids with the use of the thermal oxidizer, shall collect and record the following information for each day for emissions unit K002 and thermal oxidizer:
 - a. The name and identification of each coating, as applied;
 - b. The mass of VOC per gallon of coating solids, as applied and the solids content per gallon, as applied, and the volume, as applied, of each coating;
 - c. The maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
 - d. The calculated controlled VOC emissions rate from coatings, in pounds of OC per gallon of coating solids, as applied;
 - e. The controlled VOC emissions rate from coatings shall be calculated using:
 - i. the overall control efficiency as determined during the most recent emissions test that demonstrated that the emissions unit was in compliance; and d)(4)e.ii. or d)(4)e.iii. below:

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- ii. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied); or
 - iii. the daily volume-weighted VOC per gallon of coating solids, as applied, recorded in d)(4)c.
- f. A log or record of operating time for the capture system, control device, monitoring equipment, and associated emissions unit; and
- g. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) For purposes of compliance with the requirements of OAC rule 3745-21-09(E) pursuant to OAC rule 3745-21-09(B)(6), the permittee shall collect and record the following information each day for the thermal oxidizer:
- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent compliance test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (6) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in permit to install # 01 - 08785 issued on October 19, 2006: d)(4). The monitoring and record keeping requirements contained in the above-referenced permit to install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and recorded keeping requirements in the permit to install.

[Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii)]

- (7) The permittee shall collect and record the following information on a monthly basis:
- a. the name and identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the VOC content of each cleanup material, in fraction by weight;
 - d. the density of each VOC containing cleanup solvent used, in pounds per gallon;

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- e. the calculated, controlled VOC emission rate from all cleanup materials, in pounds or tons; and
- f. the total volume of solids from all the coatings employed, in gallons.
- g. the total VOC emissions from all the coatings employed (i.e., the calculated, controlled VOC emission rate times the total volume of solids from all coatings employed in the line), in pounds or tons; and
- h. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080 - 5209)
- (2) See 40 CFR Part 60, Subpart TT (40 CFR 60.460 - 466).
- (3) The permittee shall notify Ohio EPA Central District Office in writing of any daily record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation. This notification shall include a copy of such record and shall be sent to Ohio EPA Central District Office no later than 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit quarterly summaries of the following records:
 - a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.

These quarterly summaries shall be submitted by April 30, July 31, October 31 and January 31, and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit. Annual emission reports may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

- a. Emissions Limitation: PE from oven natural gas combustion shall not exceed 0.06 pound per hour and 0.26 ton per year. PE from the natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.07 pound per hour and 0.33 ton per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for total PE in natural gas combustion (7.6 lbs of PE /MM ft³).

The maximum capacity of the oven is 7,843 ft³/hr and 68,705,900 ft³/yr.

The maximum capacity of the thermal oxidizer is 9,804 ft³/hr and 85,882,400 ft³/yr.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and 202.

[Authority for term: OAC rule 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- b. Emissions Limitation: NO_x emissions from the oven natural gas combustion shall not exceed 0.78 pound per hour and 3.44 ton per year. NO_x emissions from natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.98 pound per hour and 4.29 tons per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-1 (7/98) for uncontrolled NO_x in natural gas combustion (100 lbs of NO_x/MMft³).

The maximum capacity of the oven is 7,843 ft³/hr and 68,705,900 ft³/yr.

The maximum capacity of the thermal oxidizer is 9,804 ft³/hr and 85,882,400 ft³/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

[Authority for term: OAC rule 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- c. Emission Limitation: SO₂ emissions from the oven natural gas combustion shall not exceed 0.01 pound per hour and 0.02 ton per year. SO₂ emissions from

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natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.01 pound per hour and 0.03 ton per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for SO₂ in natural gas combustion (0.6 lb of SO₂/MMft³).

The maximum capacity of the oven is 7,843 ft³/hr and 68,705,900 ft³/yr.

The maximum capacity of the thermal oxidizer is 9,804 ft³/hr and 85,882,400 ft³/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

[Authority for term: OAC rule 3745-77-07(C)(1)) and 3745-31-05(A)(3)]

- d. Emission Limitation: CO emissions from the oven natural gas combustion shall not exceed 0.66 pound per hour and 2.89 tons per year. CO emissions from natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.82 pounds per hour and 3.61 tons per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-1 (7/98) for CO in natural gas combustion (84 lbs of CO/MMft³).

The maximum capacity of the oven is 7,843 ft³/hr and 68,705,900 ft³/yr.

The maximum capacity of the thermal oxidizer is 9,804 ft³/hr and 85,882,400 ft³/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

[Authority for term: OAC rule 3745-77-07(C)(1)) and 3745-31-05(A)(3)]

- e. Emission Limitation: OC emissions from the oven natural gas combustion shall not exceed 0.04 pound per hour and 0.19 ton per year. OC emissions from natural gas combustion associated with the thermal oxidizer controlling K001 and K002 emissions shall not exceed 0.05 pound per hour and 0.24 ton per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for volatile organic compounds (VOC) in natural gas combustion (5.5 lbs of VOC/MMft³).

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The maximum capacity of the oven is 7,843 ft³/hr and 68,705,900 ft³/yr.

The maximum capacity of the thermal oxidizer is 9,804 ft³/hr and 85,882,400 ft³/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

[Authority for term: OAC rule 3745-77-07(C)(1)) and 3745-31-05(A)(3)]

- f. Emission Limitation: Visible particulate emissions from thermal incinerator stack shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)) and 3745-31-05(A)(3)]

- g. Emission Limitation: VOC emissions from the coating operation, including solvent cleanup activities, shall not exceed 45.7 tons per year.

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the sum total of VOC emissions from the coating operations and solvent cleanup activities. VOC emissions from coating operations are determined by summing the results of the 12 previous recent monthly calculations required pursuant to d) and multiplying the results of that summation by the overall VOC control efficiency, as determined by the most recent performance test that demonstrated that the emissions unit was in compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and 3745-31-05(A)(3)]

- h. Emission Limitation:

Option A: VOC emissions shall not exceed 0.14 kg/liter (1.17 lbs/gallon) of coating solids.

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to sections A.III and the performance testing required by section f)(2) and f)(3).

[Authority for term: 40 CFR Part 60, Subpart TT]

OR

Option B: VOC emissions shall not exceed 10 percent of the VOC's applied for each calendar month (90 percent reduction).

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to d) and the performance testing required by f)(2) and f)(3).

[Authority for term: 40 CFR Part 60, Subpart TT]

i. Emission Limitation:

Option A: The permittee shall limit organic HAP emissions to no more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction).

Applicable Compliance Method:

Calculation of the overall organic HAP control efficiency, R, shall be achieved in accordance with 40 CFR 63.5170, Equation 7 and the performance testing required by f)(2) and f)(3).

[Authority for term: 40 CFR Part 63, Subpart SSSS]

OR

Option B: The permittee shall limit organic HAP emissions to no more than 0.046 kg/liter (0.38 lbs/gallon) of solids applied during each 12-month compliance period.

Applicable Compliance Method: Calculation of the organic HAP emitted during the month, for each calendar month, using Equation 8 of 40 CFR 63.5170 and the performance testing required by f)(2) and f)(3).

[Authority for term: 40 CFR Part 60, Subpart SSSS]

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. Consistent with U.S. EPA streamlining policy, the permittee may elect upon approval of Ohio EPA to utilize the applicable performance test methods and procedures per 40 CFR Part 63, Subpart SSSS in lieu of the performance test methods and procedures contained in 40 CFR Part 60, Subpart TT. Subpart SSSS performance test methods and procedures are generally more stringent than the performance test methods and procedures of Subpart TT
 - b. The emission testing shall be conducted within 2 years from issuance of this permit
 - c. The test(s) shall be conducted while the emissions units are operating at or near the maximum capacities for collected emissions from emissions units K001 and K002, unless otherwise specified or approved by the Ohio EPA, Central District Office.
 - d. The permittee shall conduct a performance test for each capture and control system to determine the destruction or removal efficiency of each control device

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according to 40 CFR 63.5160(d) as described in f)(2)h., and the capture efficiency of each capture system according to 40 CFR 63.5160(e) as described in f)(2)i., while burning natural gas in the curing ovens and collecting emissions from these emissions units (K001 and K002).

- e. The permittee shall determine the organic HAP weight fraction of each coating material applied by following one of the following procedures:
- i. the permittee may determine the coating material organic HAP content in accordance with U.S. EPA Method 311 of appendix A of 40 CFR 63. U.S. EPA Method 311 determination may be performed by the manufacturer of the material and the results provided to the permittee.. The organic HAP content shall be calculated according to the following criteria and procedures:
 - (a) count only those organic HAP that are measured to be present at greater than or equal to 0.1 weight percent for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and greater than or equal to 1.0 weight percent for other organic HAP compounds;
 - (b) express the weight fraction of each organic HAP counted according to subparagraph (2). of this section as a value truncated to four places after the decimal point (for example, 0.3791); and
 - (c) calculate the total weight fraction of organic HAP in the tested material by summing the counted individual organic HAP weight fractions and truncating the result to three places after the decimal point (for example, 0.763);
 - ii. the permittee may determine the total volatile matter content of a coating as weight fraction of nonaqueous volatile matter and use it as a substitute for organic HAP, using U.S. EPA Method 24 of 40 CFR 60, appendix A. The U.S. EPA Method 24 determination may be performed by the manufacturer of the coating and the results provided to the permittee;
 - iii. the permittee may use an alternative test method for determining the organic HAP weight fraction of a coating once the Administrator has approved it. The permittee shall follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval; and
 - iv. the permittee may use coating formulation data provided that the information represents each organic HAP present at a level equal to or greater than 0.1 percent for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and equal to or greater than 1.0 percent for other organic HAP compounds in any raw material used, weighted by the mass fraction of each raw material used in the material. Coating formulation data may be provided by the manufacturer of the coating material.

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In the event of any inconsistency between test data obtained with the test methods specified in f)(2)e.i. through f)(2)e.iii. and formulation data, the test data will govern.

- f. The permittee shall determine the VOC weight fraction of each coating material applied using U.S. EPA Method 24. For coatings, the permittee may determine the total volatile matter content as weight fraction of nonaqueous volatile matter using U.S. EPA Method 24 of 40 CFR 60, appendix A. The U.S. Method 24 determination may be performed by the manufacturer of the coating and the results provided to the permittee. Results of U.S. EPA Method 24 testing on water-borne coatings shall be adjusted as described in section 12.6 of U.S. EPA Method 24.
- g. The permittee shall determine the solids content of each coating material applied. The permittee may determine the volume solids content using ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 (incorporated by reference, see 40 CFR 63.14), or an EPA approved alternative method. The ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 determination may be performed by the manufacturer of the material and the results provided to the permittee. Alternatively, the permittee may rely on formulation data provided by material providers to determine the volume solids.
- h. The permittee shall conduct a performance test to establish the destruction or removal efficiency of the control device or the outlet VOC concentration achieved by the oxidizer, according to the methods and procedures in U.S. EPA Methods 1 through 4 and 25 or 25A, 40 CFR Part 60, Appendix A or U.S. EPA Method 320, 40 CFR Part 63. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
- i. The permittee shall determine the capture efficiency of the enclosure on the coating operation by one of the following procedures:
 - i. for an enclosure that meets the criteria for a PTE, the permittee may assume it achieves 100 percent capture efficiency. The permittee must confirm that the capture system is a PTE by demonstrating that it meets the requirements of section 6 of U.S. EPA Method 204 of 40 CFR 51, Appendix M (or a U.S. EPA-approved alternative method), and that all exhaust gases from the enclosure are delivered to a control device;
 - ii. the permittee may determine capture efficiency (CE) according to the protocols for testing with temporary total enclosures that are specified in U.S. EPA Methods 204A through F of 40 CFR 51, Appendix M. The permittee may exclude never-controlled work stations from such capture efficiency determinations; and
 - iii. as an alternative to the procedures specified in paragraphs (i)(i) and (ii) of this section, if a capture efficiency test is required, the permittee may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective or the Lower Confidence Limit approach as described in Appendix A to 40 CFR 63, Subpart KK. The permittee

may exclude never-controlled work stations from such capture efficiency determinations.

During the performance test specified in f)(2)h, the permittee shall monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. The permittee shall monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.

The permittee shall use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test.

This average combustion temperature is the minimum operating limit for the thermal oxidizer for purposes of 40 CFR Part 63, Subpart SSSS.

This average combustion temperature minus 50 degrees Fahrenheit is the minimum operating limit for the thermal oxidizer for purposes of 40 CFR Part 60, Subpart TT.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

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

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



3. P202, INTERMIX AREA COATING MIXING OPERATIONS

Operations, Property and/or Equipment Description:

MIXING OPERATIONS FOR COATINGS

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Rows include OAC rule 3745-31-05(A)(3), OAC rule 3745-31-05(F), and OAC rule 3745-21-07(G)(2).

(2) Additional Terms and Conditions

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

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

Permit to Install and Operate P0104523 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee as allowed by the requirements under OAC rule 3745-31-05(F):



- i. emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 9.9 tons as a rolling, 12-month summation.
 - c. This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in *Ashland Chem. Co. v. Jones* (2001), 92 Ohio St.3.d 234.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information for each month for the mixing operation:
 - a. the company identification for each coating mixed and for each cleanup material employed;
 - b. the number of gallons of each coating mixed and each cleanup material employed;
 - c. the volatile organic compound content of each coating mixed and each cleanup material, in pounds per gallon;
 - d. the total volatile organic compound emission rate for all coatings and cleanup materials, in pounds per month;
 - e. the rolling, 12-month summation of volatile organic compound emissions, in tons; and
 - f. if a credit to emissions from recovered cleanup materials is to be used in emissions calculations, the permittee shall also record the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit.

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- e) Reporting Requirements
 - (1) The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the average hourly volatile organic compound emissions from the coatings and cleanup materials exceeded the limitation of 6.9 pounds per hour.

Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then this recordkeeping requirement no longer applies.

[Authority for term: OAC rule 3745-77-07(C)(1)]



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- (2) The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the rolling, 12-month emissions limitation of 9.9 tons.

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

- a. Emissions limitation: Emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 9.9 tons as a rolling, 12-month summation.

Applicable compliance method: Compliance shall be based upon the record keeping requirements as specified in d)(1) and the emission factors contained in AP-42, Volume I, 5th Edition, Section 6.4, dated January, 2005. Alternative emission factors may be used with prior approval by the Central District Office and may also require this permit to be modified.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, 18 and 25 or 25A or Part 63 Appendix A Method 320.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- b. Emissions limitation: Emissions of VOCs from this emissions unit shall not exceed 6.9 lbs/hr.

Applicable compliance method: Compliance demonstrated by calculating the hourly emissions based on the record keeping requirements as specified in d)(1)(d) and the following calculation method:

Hourly emissions (lb VOC/hr) = [monthly emissions (lb VOC/month) / number of batches (batch/month)] X 2 batches/hour

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, 18 and 25 or 25A or Part 63 Appendix A Method 320.

Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then this testing requirement no longer applies.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.