Ohio Environmental Protection Agency

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

12/23/2010

Certified Mail

Facility ID: 1431050879
Permit Number: P0104800
County: Hamilton

Monica Carsten
Steelcraft Mfg. Co.
9017 Blue Ash Road
Cincinnati, OH 45242-6816

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 11/17/2010. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

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

and

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Hamilton County Dept. of Environmental Services

Response to Comments

Response to comments for: Title V Permit

Facility ID:	1431050879
Facility Name:	Steelcraft Mfg. Co.
Facility Description:	Manufacturer of Steel Doors
Facility Address:	9017 Blue Ash Road Cincinnati, OH 45242-6816 Hamilton County
Permit #:	P0104800, Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Cincinnati Enquirer on 11/22/2010. The comment period ended on 12/22/2010.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic:
    a. Comment: No comments were received on the Draft Title V.
    b. Response: No changes were made going from Draft to PPP issuance.

Ohio | Environmental Protection Agency

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Steelcraft Mfg. Co.

Facility ID:	1431050879
Permit Number:	P0104800
Permit Type:	Renewal
Issued:	12/23/2010
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Steelcraft Mfg. Co.

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Authorization

Facility ID: 1431050879
Facility Description: Manufacturer of Steel Doors
Application Number(s): A0029486, A0036219
Permit Number: P0104800
Permit Description: Manufacturer of Steel Doors
Permit Type: Renewal
Issue Date: 12/23/2010
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0097834

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

Steelcraft Mfg. Co.
9017 Blue Ash Road
Cincinnati, OH 45242-6816

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

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

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 Hamilton County Dept. of Environmental Services. 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:

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.

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.

(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 Hamilton County Dept. of Environmental Services.

(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 contaminent 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

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

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

EU ID	Operations, Property and/or Equipment Description
B001	<10 MMBtu/Hr Natural Gas Fired Boiler
B002	<10 MMBtu/Hr Natural Gas Fired Boiler
B003	<10 MMBtu/Hr Natural Gas Fired Boiler
B004	<10 MMBtu/Hr Natural Gas Fired Boiler (PTI 14-2289)

   Each insignificant emissions unit at this facility must comply with all applicable Ohio EPA and federal regulations, as well as any emission limitations and/or control requirements contained within a 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.

3. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimus" criteria established in OAC rule 3745-15-05:

K014	Manual spot touch up of off-spec doors
P013	Excess epoxy grinding
L001	Non-halogenated solvent cold cleaner
L002	Non-halogenated solvent cold cleaner
L003	Non-halogenated solvent cold cleaner
P014	Universal Grit Blaster
P015	L Line Door Cutting Booth
P016	Paint Line 1 Feather Duster

C. Emissions Unit Terms and Conditions

1. K001, No. 1 Paint line

Operations, Property and/or Equipment Description:

K001-Paint Line w/Dry filtration system

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 operation(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 are identified below. 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 3745-21-09(U)(1)(c)	The volatile organic compound (VOC) content of the coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents.
b.	OAC Rule 3745-17-11(C)	See b)(2)a. and c)(1)&(2) below.
c.	40 CFR Part 63, Subpart MMMM (40 CFR 63.3880-63.3981) [In accordance with 40 CFR 63.3890(b)(1) this existing affected source is complying with the MACT through the use of compliant general use coatings]	The organic HAP emissions from the existing general use coatings operation shall not exceed 2.6 lbs/gal of coating solids used during each rolling, 12-month period. See b)(2)b. and c)(3).
d.	40 CFR 63.1-15 (40 CFR 63.3901)	As specified in 40 CFR 63.3901, Table 2 to 40 CFR Part 63, Subpart MMMM - Applicability of 40 CFR Part 63 General Provisions to Subpart MMMM, shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA

approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

b. The permittee, using the "compliant material" option, shall not apply any coating in the coating operation(s) with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.3890(b)(1); and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.3950, 63.3951, and 63.3952 for the compliance period. If required, the compliance calculations shall be performed on a monthly basis, as a rolling 12-month emission rate.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(Authority for term: OAC rules 3745-17-11(C)(1) & (2)(b) and 3745-77-07(A)(1))

(2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(Authority for term: OAC rules 3745-17-11(C)(1) & (2)(b) and 3745-77-07(A)(1))

(3) Every individual coating used in the "compliant coating operations" must meet the emission limitation(s) contained in 40 CFR 63.3890(b)(1); and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. Any coating operation meeting these limitations, for each material applied, shall not be required to meet the operating limits in 40 CFR 63.3892 or work practice standards in 40 CFR 63.3893.

(Authority for term: 40 CFR 63.3892(a), 40 CFR 63.3893(a), and OAC rule 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the line:

a. the name and identification of each coating, as applied; and

b. the VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each

such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

(Authority for term: OAC rules 3745-21-09(B) and 3745-77-07(C)(1))

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

(Authority for term: OAC rules 3745-17-11(C)(2)(a) and 3745-77-07(C)(1))

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

(Authority for term: OAC rules 3745-17-11(C)(2)(c) and 3745-77-07(C)(1))

(4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(Authority for term: OAC rules 3745-17-11(C)(2)(c) and 3745-77-07(C)(1))

(5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

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

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

(Authority for term: OAC rules 3745-17-11(C)(2)(d) &(f) and 3745-77-07(C)(1))

(6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications

made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(Authority for term: OAC rules 3745-17-11(C)(2)(e),(f), and (g) and 3745-77-07(C)(1))

(7) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating employed during the month;

b. *the organic HAP content (*H_c *), as applied, of each coating employed. T*he organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids, for each coating employed during the month shall be calculated using Equation 2 below;

$$H_c = \frac{(D_c)(W_c)}{V_s} \qquad (Eq.\ 2)$$

Where:

H_c= Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.

D_c= Density of coating, kg(lbs) coating per liter (gal) coating, determined according to 40 CFR 63.3941(c).

W_c= Mass fraction of organic HAP in the coating, kg (lbs) organic HAP per kg (lbs) coating, determined according to CFR 63.3941(a).

V_s= Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to CFR 63.3941(b).

c. the name and identification number of each thinners, additives, and cleaning/purge materials employed during the month; and

d. documentation that the thinners, additives, and cleaning/purge materials employed contained no HAPs as identified in section 112(b) of the Clean Air Act. Materials with an organic HAP content less than 1.0% by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass shall be considered to be Non-HAP containing materials.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3941)

e) Reporting Requirements

(1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each monthly record showing the use of non-complying coating. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-21-09(B) and 3745-77-07(A)(1))

(2) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

(Authority for term: OAC rules 3745-15-03 and 3745-77-07(A)(1))

(3) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is the 6-month period ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of the specific compliance method used;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. if there were no deviations from the emission limitations in 63.3890(b)(1) or the requirement to employ non-HAP containing thinners, additives, and cleaning/purge materials, a statement that there were no deviations from the emissions limitations during the reporting period; and

g. if there were any deviations during the compliance period for the "compliant material" coating operations, the report shall include the following information;

h. an identification of each coating used that deviated from the applicable emission limit, and each thinner/additive, and cleaning material used that contained organic HAP and the dates and times each was used;

i. the calculation of the organic HAP content for each coating that deviated from the applicable limit, kg (lb) organic HAP per liter (gallon) of coating solids;

j. the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation; and

k. a statement of the cause of each deviation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3920)

f) Testing Requirements

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

a. Emission Limitation:

The volatile organic compound (VOC) content of the coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

If required, USEPA Methods 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or ink, the permitee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

(Authority for term: OAC rules 3745-21-09(U)(2)(c), OAC rule 3745-21-04 and 3745-77-07(A)(1))

b. Emission Limitation:

The organic HAP emissions from the existing general use coatings operations shall not exceed 2.6 lbs/gal of coating solids used during each rolling, 12-month period.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(7) above.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3941)

c. Emission Limitation:

Only Non-HAP thinners, additives, and cleaning/purge materials may be employed.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(7) above.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3941).

g) Miscellaneous Requirements

(1) None.

2. K002, No. 2 Paint line

Operations, Property and/or Equipment Description:

K002-Paint Line w/Dry filtration system

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 operation(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 are identified below. 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 3745-21-09(U)(1)(c)	The volatile organic compound (VOC) content of the coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents.
b.	OAC Rule 3745-17-11(C)	See b)(2)a. and c)(1) & (2) below.
c.	40 CFR Part 63, Subpart MMMM (40 CFR 63.3880-63.3981) [In accordance with 40 CFR 63.3890(b)(1) this existing affected source is complying with the MACT through the use of compliant general use coatings]	The organic HAP emissions from the existing general use coatings operation shall not exceed 2.6 lbs/gal of coating solids used during each rolling, 12-month period. See b)(2)b. and c)(3).
d.	40 CFR 63.1-15 (40 CFR 63.3901)	As specified in 40 CFR 63.3901, Table 2 to 40 CFR Part 63, Subpart MMMM - Applicability of 40 CFR Part 63 General Provisions to Subpart MMMM, shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA

approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

b. The permittee, using the "compliant material" option, shall not apply any coating in the coating operation(s) with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.3890(b)(1); and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.3950, 63.3951, and 63.3952 for the compliance period. If required, the compliance calculations shall be performed on a monthly basis, as a rolling 12-month emission rate.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(Authority for term: OAC rules 3745-17-11(C)(1) & (2)(b) and 3745-77-07(A)(1))

(2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(Authority for term: OAC rules 3745-17-11(C)(1) & (2)(b) and 3745-77-07(A)(1))

(3) Every individual coating used in the "compliant coating operations" must meet the emission limitation(s) contained in 40 CFR 63.3890(b)(1); and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. Any coating operation meeting these limitations, for each material applied, shall not be required to meet the operating limits in 40 CFR 63.3892 or work practice standards in 40 CFR 63.3893.

(Authority for term: 40 CFR 63.3892(a), 40 CFR 63.3893(a), and OAC rule 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the line:

a. the name and identification of each coating, as applied; and

b. the VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each

such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

(Authority for term: OAC rules 3745-21-09(B) and 3745-77-07(C)(1))

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

(Authority for term: OAC rules 3745-17-11(C)(2)(a) and 3745-77-07(C)(1))

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

(Authority for term: OAC rules 3745-17-11(C)(2)(c) and 3745-77-07(C)(1))

(4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(Authority for term: OAC rules 3745-17-11(C)(2)(c) and 3745-77-07(C)(1))

(5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

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

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

(Authority for term: OAC rules 3745-17-11(C)(2)(d) &(f) and 3745-77-07(C)(1))

(6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications

made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(Authority for term: OAC rules 3745-17-11(C)(2)(e),(f), and (g) and 3745-77-07(C)(1))

(7) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating employed during the month;

b. *the organic HAP content (*H_c *), as applied, of each coating employed. T*he organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids, for each coating employed during the month shall be calculated using Equation 2 below;

$$H_c = \frac{(D_c)(W_c)}{V_s} \qquad (Eq.\ 2)$$

Where:

H_c= Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.

D_c= Density of coating, kg(lbs) coating per liter (gal) coating, determined according to 40 CFR 63.3941(c).

W_c= Mass fraction of organic HAP in the coating, kg (lbs) organic HAP per kg (lbs) coating, determined according to CFR 63.3941(a).

V_s= Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to CFR 63.3941(b).

c. the name and identification number of each thinners, additives, and cleaning/purge materials employed during the month; and

d. documentation that the thinners, additives, and cleaning/purge materials employed contained no HAPs as identified in section 112(b) of the Clean Air Act. Materials with an organic HAP content less than 1.0% by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass shall be considered to be Non-HAP containing materials.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3941)

e) Reporting Requirements

(1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each monthly record showing the use of non-complying coating. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-21-09(B) and 3745-77-07(A)(1))

(2) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

(Authority for term: OAC rules 3745-17-11(C) and 3745-77-07(A)(1))

(3) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is the 6-month period ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of the specific compliance method used;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. if there were no deviations from the emission limitations in 63.3890(b)(1) or the requirement to employ non-HAP containing thinners, additives, and cleaning/purge materials, a statement that there were no deviations from the emissions limitations during the reporting period; and

g. if there were any deviations during the compliance period for the "compliant material" coating operations, the report shall include the following information;

h. an identification of each coating used that deviated from the applicable emission limit, and each thinner/additive, and cleaning material used that contained organic HAP and the dates and times each was used;

i. the calculation of the organic HAP content for each coating that deviated from the applicable limit, kg (lb) organic HAP per liter (gallon) of coating solids;

j. the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation; and

k. a statement of the cause of each deviation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3920)

f) Testing Requirements

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

a. Emission Limitation:

The volatile organic compound (VOC) content of the coatings employed shall not exceed 3.5 pounds per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

If required, USEPA Methods 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or ink, the permitee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

(Authority for term: OAC rules 3745-21-09(U)(2)(c), 3745-21-04, and 3745-77-07(A)(1))

b. Emission Limitation:

The organic HAP emissions from the existing general use coatings operations shall not exceed 2.6 lbs/gal of coating solids used during each rolling, 12-month period.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(7) above.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3941)

c. Emission Limitation:

Only Non-HAP thinners, additives, and cleaning/purge materials may be employed.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(7) above.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3941).

g) Miscellaneous Requirements

(1) None.

3. K003, Plant 3 spray booth

Operations, Property and/or Equipment Description:

Miscellaneous Metal Parts Paint Booth w/ Dry filtration system

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 operation(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 are identified below. 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)(3), as effective 11/30/01 Permit to Install P0106828	Volatile organic compounds (VOC) emissions from the application of coatings, clear coatings, and cleanup materials shall not exceed 351.82 pounds per day (lb/day). Particulate emissions (PE) or particulate matter emissions 10 microns and less in diameter (PM10) or particulate matter emissions 2.5 microns and less in diameter (PM2.5) shall not exceed 0.551 pound per hour and 2.41 TPY. The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average. See b)(2)e. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1), OAC rule 3745-31-05(D) and 40 CFR Part 63, Subpart MMMM.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 Permit to Install P0106828	See b)(2)h. below.
c.	OAC rule 3745-31-05(D) to avoid non-attainment new source review	VOC emissions shall not exceed 13.61 tons per year (TPY) from the application

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Permit to Install P0106828	of coatings and cleanup material used in this emissions unit, based on a rolling, 12-month summation. See c)(2) through c)(4) below.
d.	OAC rule 3745-21-09(U)(1)(a)	See b)(2)b. below.
e.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)c. below.
f.	40 CFR Part 63, Subpart MMMM (40 CFR 63.3880-63.3981) [In accordance with 40 CFR 63.3890(b)(1) this existing affected source is complying with the MACT through the use of compliant general use coatings]	The organic HAP emissions from the existing general use coatings operation shall not exceed 2.6 lbs/gal of coating solids used during each rolling, 12-month period. See b)(2)f. and c)(1) below.
g.	40 CFR 63.1-15 (40 CFR 63.3901)	As specified in 40 CFR 63.3901, Table 2 to 40 CFR Part 63, Subpart MMMM - Applicability of 40 CFR Part 63 General Provisions to Subpart MMMM, shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
h.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 pound per hour.
i.	OAC rule 3745-17-07(A)(1)	The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule average with regard to b)(1)b. For purposes of satisfying BAT, this limitation is equivalent to BAT as denoted in b)(1)a.

(2) Additional Terms and Conditions

a. The daily VOC emission limitation outlined above is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with these limitations.

b. The VOC content for each clear coating employed in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

c. The VOC content for each coating employed in this emissions unit that is dried at temperatures not exceeding two hundred degrees Fahrenheit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

d. The VOC content for each cleanup material employed in this emissions unit shall not exceed 7.3 pounds of VOC per gallon of cleanup material.

e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, OC content limitations and usage limitations.

f. The permittee, using the "compliant material" option, shall not apply any coating in the coating operation(s) with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.3890(b)(1); and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.3950, 63.3951, and 63.3952 for the compliance period. If required, the compliance calculations shall be performed on a monthly basis, as a rolling 12-month emission rate.

g. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, the 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 3745-31-05, then the mass PE, PM10, and PM2.5 emission limitations along with the visible particulate limitation in b)(1)a. no longer apply.

h. 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:

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) or particulate matter emissions 10 microns and less in diameter (PM10) or particulate matter emissions 2.5 microns and less in diameter (PM2.5) from this air contaminate source because the calculated annual emissions rate for PE, PM10 and PM2.5 is less than 10 tons per year, taking into account the federally enforceable rule limit of 0.551 pound of PE per hour under OAC rule 3745-17-11(B).

c) Operational Restrictions

(1) Every individual coating used in the "compliant coating operations" must meet the emission limitation(s) contained in 40 CFR 63.3890(b)(1); and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. Any coating operation meeting these limitations, for each material applied, shall not be required to meet the operating limits in 40 CFR 63.3892 or work practice standards in 40 CFR 63.3893.

(Authority for term: 40 CFR 63.3892(a), 40 CFR 63.3893(a), and OAC rule 3745-77-07(A)(1))

(2) The amount of non-clear coating material used in this emissions unit shall not exceed 4500 gallons. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

(Authority for term: OAC rules 3745-31-05 and 3745-77-07(A)(1))

(3) The amount of clear coating material used in this emissions unit shall not exceed 1880 gallons. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

(Authority for term: OAC rules 3745-31-05 and 3745-77-07(A)(1))

(4) The amount of cleanup material used in this emissions unit shall not exceed 450 gallons per year. Compliance with the above limitation shall be based on a rolling, 12 month-summation.

(Authority for term: OAC rules 3745-31-05 and 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the line:

a. the name and identification of each coating and cleanup material, as applied; and

b. the VOC content of each coating and cleanup material (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific “gallons/year” and “tons/year” limitations, or just a “tons/year” limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

(Authority for term: OAC rules 3745-21-09(B) and 3745-77-07(C)(1))

(2) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating employed during the month;

b. *the organic HAP content (*H_c *), as applied, of each coating employed. T*he organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids, for each coating employed during the month shall be calculated using Equation 2 below;

$$H_c = \frac{(D_c)(W_c)}{V_s} \qquad (Eq.\ 2)$$

Where:

H_c= Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.

D_c= Density of coating, kg(lbs) coating per liter (gal) coating, determined according to 40 CFR 63.3941(c).

W_c= Mass fraction of organic HAP in the coating, kg (lbs) organic HAP per kg (lbs) coating, determined according to CFR 63.3941(a).

V_s= Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to CFR 63.3941(b).

c. the name and identification number of each thinners, additives, and cleaning/purge materials employed during the month; and

d. documentation that the thinners, additives, and cleaning/purge materials employed contained no HAPs as identified in section 112(b) of the Clean Air Act. Materials with an organic HAP content less than 1.0% by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass shall be considered to be Non-HAP containing materials.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3941)

(3) The permittee shall collect and record the following information each month for the emission unit:

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

b. the VOC content of each coating and cleanup material, as applied;

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

d. the monthly usage totals for clear coat, non-clear coat, and cleanup materials employed;

e. the monthly VOC emission totals for the month (the summation of line b. x line c. for each coating and cleanup material employed);

f. the updated, rolling 12-month usage totals for all clear coat materials, non-clear coating materials, and cleanup materials employed, in gallons (the summation of the current months usage totals added to the previous 11-month usage totals); and

g. the updated, rolling 12-month total combined VOC emissions from all coatings and cleanup materials employed, in tons (the summation of the current months VOC emission totals added to the previous 11-month emission totals).

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(4) 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 P0106828: d)(1)-d)(3). 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 record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each monthly record showing the use of non-complying coatings or clean-up materials. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-21-09(B) and 3745-77-07(A)(1))

(2) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is the 6-month period ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of the specific compliance method used;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. if there were no deviations from the emission limitations in 63.3890(b)(1) or the requirement to employ non-HAP containing thinners, additives, and cleaning/purge materials, a statement that there were no deviations from the emissions limitations during the reporting period; and

g. if there were any deviations during the compliance period for the "compliant material" coating operations, the report shall include the following information;

h. an identification of each coating used that deviated from the applicable emission limit, and each thinner/additive, and cleaning material used that contained organic HAP and the dates and times each was used;

i. the calculation of the organic HAP content for each coating that deviated from the applicable limit, kg (lb) organic HAP per liter (gallon) of coating solids;

j. the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation; and

k. a statement of the cause of each deviation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3920)

(3) The permittee shall submit quarterly deviation (excursion) reports for any exceedences of the following:

a. usage limitations specified in c)(2) - c(4); and.

b. the TPY of VOC emission total specified in b)(1)c.

If no exceedances occurred, the permittee shall state so in the report.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05)

(4) The permittee shall submit annual reports to the Hamilton County Department of Environmental Services quantifying the total VOC emissions from this emissions unit and the number of gallons of clear coat, non-clear coating material, and cleanup materials employed in this emissions unit. This report is due by January 31 of each year and shall cover the previous calendar year.

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

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit To Install P0106828: e)(1)-e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitations:

The VOC content for each clear coating employed in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied; and

The VOC content for each coating employed in this emissions unit that is dried at temperatures not exceeding two hundred degrees Fahrenheit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

If required, USEPA Methods 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or ink, the permitee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

(Authority for term: OAC rules 3745-21-09(U), 3745-21-04, and 3745-77-07(A)(1))

b. Emission Limitation:

The organic HAP emissions from the existing general use coatings operations shall not exceed 2.6 lbs/gal of coating solids used during each rolling, 12-month period.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(2) above.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3941)

c. Emission Limitation:

Only Non-HAP thinners, additives, and cleaning/purge materials may be employed.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(2) above.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3941).

d. Emission Limitation:

VOC emissions shall not exceed 13.61 tons per year (TPY) from the application of coatings and cleanup material used in this emissions unit, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(3) above.

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

e. Emission Limitation:

351.82 lbs of VOC/day.

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the maximum hourly VOC emission rate of 14.65 lbs per hour by 24 hours per day (14.65 X 24 = 351.82).

See permit to install (PTI) 14-05897 issued on 10/4/2007 for the calculation of the maximum hourly VOC emission rate.

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

f. Emission Limitation:

The VOC content for each cleanup material employed in this emissions unit shall not exceed 7.3 pounds of VOC per gallon of cleanup material.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(3) above.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D) and 3745-77-07(C)(1))

g. Emission Limitation:

PE shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

The hourly PE rate limitation is based on Table 1 in OAC rule 3745-17-11.

To determine the worst case PE rate, the following equation shall be used:

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

where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

Authority for Term: OAC rule 3745-17-11(B) and 3745-77-07(C)(1))

h. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations 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 3745-17-03(B)(1) and 3745-77-07(C)(1))

i. Emission Limitation:

Particulate emissions (PE) or particulate matter emissions 10 microns and less in diameter (PM10) or particulate matter emissions 2.5 microns and less in diameter (PM2.5) shall not exceed 2.41 TPY.

Applicable Compliance Method:

The annual PE, PM10 and PM2.5 emission rate is based on this emission unit's potential to emit. The annual PE, PM10 and PM2.5 emission rate is calculated by multiplying the maximum hourly emission rate by 8760 hours per year/2000 pounds per ton. The PM10 and PM2.5 emission rates are assumed to be less than or equal to the PE rate.

Authority for Term: OAC rule 3745-31-05 and 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0106828:f)(1) The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

4. K006, Honeycomb paper adhesive coating line

Operations, Property and/or Equipment Description:

Honeycomb paper adhesive coating line.

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 operation(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 are identified below. 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 3745-21-09(FF)	The VOC content of the coatings employed shall not exceed 0.7 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.
b.	40 CFR Part 63, Subpart JJJJ National Emission Standard for Hazardous Air Pollutants: Paper and other Web Coating (40 CFR 63.3280 – 63.3420) In accordance with 40 CFR 63.3300, this emissions unit is a web coating line at an existing facility that is a major source of HAP subject to the emissions limitations / control measures specified in this section.	As specified in 40 CFR 63.3320(b)(2), Organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg organic HAP per kg coating material) for each month. See b)(2)a.
c.	40 CFR 63.1-15 (40 CFR 63.3340)	See b)(2)b.

(2) Additional Terms and Conditions

a. This emission unit is subject to the requirements of 40 CFR Part 63 Subpart JJJJ -National Emissions Standards for Hazardous Air Pollutants for Paper and other Web Coating. The permittee shall comply with the applicable emission limitations and operational restrictions specified in 40 CFR Part 63.3280 – 63.3420. 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 appropriate Ohio EPA District Office or local air agency.

b. As specified in 40 CFR 63.3340, Table 2 to 40 CFR Part 63, Subpart JJJJ - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ, shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

a. the name and identification number of each coating, as applied; and

b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$

where:

D_C = the density of coating, in pounds of coating per gallon of coating.

$W_{VOC} = W_{VM} - W_W - W_{ES}$

V_S = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$V_{VOC} = V_{VM} - V_W - V_{ES}$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(B)(3)(f), and OAC rule 3745-21-10(B)(8)).

(2) The permittee shall collect and record the organic HAP content, recorded in kg of organic HAP/kg of coating material, for each coating employed during the month. The organic HAP content shall be determined by the methods specified in 40 CFR Part 63.3370(b).

Currently, the permittee has chosen to demonstrate compliance with the HAP content restrictions by the use of “as-purchased” compliant coating materials (40 CFR 63.3370(a)(1)). Should the permittee choose another compliance option as provided for in 63.3370(a)(2)-63.3370(a)(6), the permittee shall collect and record the information

specified in 63.3370(a)(2)-63.3370(a)(6) and 63.3410(a) to demonstrate ongoing compliance.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 63.3370(a)(1)(i), 63.3370(b), and 63.3410(a)(1)(vi))

e) Reporting Requirements

(1) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of non-complying coatings. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(Authority for term: OAC rule 3745-77-07(C)(1)and OAC rule 3745-21-09(B)(3)(g))

(2) The permittee shall submit semi-annual compliance reports in accordance with 40 CFR Part 63.3400(c) by January 31 and July 31 of each year covering the previous six calendar months of operation. The semi-annual compliance reports shall contain the following information as specified in 40 CFR Part 63.3400(c)(2):

a. company name and address;

b. statement by a responsible official with the official's name, title, and signature certifying the accuracy of the content of the report;

c. the date of the report and beginning and ending dates of the reporting period;

d. if there are no deviations from the organic HAP emission limitations as specified in b)(2), a statement that there were no deviations from the emissions limitations during the reporting period; and,

e. if there were any deviations from the organic HAP emission limitations as specified in b)(2). during the reporting period, the report shall include the following information:

i. the total operating time of each affected source during the reporting period; and,

ii. information on the number, duration, and cause of the deviations (including unknown cause), if applicable, and the corrective action taken.

In addition to the above, the semi-annual compliance report shall include additional information if the following changes occur at the facility: 1) a change occurs at the facility or within the process that might affect its compliance status; 2) a change from what was reported in the Initial Notification of Compliance Status occurs at the facility or within the process; or 3) a change to another emission limitation option under 40 CFR Part 63, Subpart JJJJ.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63.3400(c))

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. VOC Content Limitation:

The VOC content of the coatings employed shall not exceed 2.9 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

If required, USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-21-10(B))

b. Organic HAP Emission Limitation:

Organic HAP emissions shall not exceed more than 4 percent of the mass of coating materials applied (0.04 kg organic HAP per kg coating material) for each month.

Applicable Compliance Method:

Compliance with the applicable organic HAP emission limitation shall be demonstrated by the record keeping requirements in d)(2).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63.3360(c))

g) Miscellaneous Requirements

(1) None.

5. K008, Water based adhesive panel L-line

Operations, Property and/or Equipment Description:

Water based adhesive panel coating line w/dry filtration system.

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 operation(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 are identified below. 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)(3) (PTI 14-01893)	Volatile organic compounds (VOC) emissions shall not exceed 13.32 pounds per hour (lbs/hr)*. *The hourly VOC emission limitation outlined above is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with these limitations. See c)(4). The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(FF) and 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Netting Demonstration to avoid non-attainment New Source Review.	VOC emissions shall not exceed 17 tons per year (TPY), based on a rolling, 12-month summation. See c)(5).
c.	OAC rule 3745-21-09(FF)(1)	The VOC content for each adhesive employed in this emissions unit shall not exceed 0.7 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
d.	OAC Rule 3745-17-11(C)	See b)(2)a. and c)(1) & (2) below.
e.	40 CFR Part 63, Subpart MMMM (40 CFR 63.3880-63.3981)	The organic HAP emissions from the existing general use coatings operation shall not exceed 2.6 lbs/gal of coating

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 40 CFR 63.3890(b)(1) this existing affected source is complying with the MACT through the use of compliant general use coatings]	solids used during each rolling, 12-month period. See b)(2)b. and c)(3).
f.	40 CFR 63.1-15 (40 CFR 63.3901)	As specified in 40 CFR 63.3901, Table 2 to 40 CFR Part 63, Subpart MMMM - Applicability of 40 CFR Part 63 General Provisions to Subpart MMMM, shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

b. The permittee, using the “compliant material” option, shall not apply any coating in the coating operation(s) with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.3890(b)(1); and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.3950, 63.3951, and 63.3952 for the compliance period. If required, the compliance calculations shall be performed on a monthly basis, as a rolling 12-month emission rate.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(Authority for term: OAC rules 3745-17-11(C)(1) & (2)(b) and 3745-77-07(A)(1))

(2) In the event the particulate filter system is not operating in accordance with the manufacturer’s recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(Authority for term: OAC rules 3745-17-11(C)(1) & (2)(b) and 3745-77-07(A)(1))

(3) Every individual coating used in the "compliant coating operations" must meet the emission limitation(s) contained in 40 CFR 63.3890(b)(1); and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. Any coating operation meeting these limitations, for each material applied, shall not be required to meet the operating limits in 40 CFR 63.3892 or work practice standards in 40 CFR 63.3893.

(Authority for term: 40 CFR 63.3892(a), 40 CFR 63.3893(a), and OAC rule 3745-77-07(A)(1))

(4) The development and use of waterbase adhesives to replace the solvent line.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3))

(5) Coating usage shall not exceed 94400 gallons per year, based on a rolling, 12-month summation.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(D))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the line:

a. the name and identification of each coating, as applied; and

b. the VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

(Authority for term: OAC rules 3745-21-09(B) and 3745-77-07(C)(1))

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

(Authority for term: OAC rules 3745-17-11(C)(2)(a) and 3745-77-07(C)(1))

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

(Authority for term: OAC rules 3745-17-11(C)(2)(c) and 3745-77-07(C)(1))

(4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(Authority for term: OAC rules 3745-17-11(C)(2)(c) and 3745-77-07(C)(1))

(5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

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

(Authority for term: OAC rules 3745-17-11(C)(2)(d) & (f) and 3745-77-07(C)(1))

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

(Authority for term: OAC rules 3745-17-11(C)(2)(e), (f), and (g) and 3745-77-07(C)(1))

(7) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating employed during the month;

b. *the organic HAP content (*H_c *), as applied, of each coating employed. T*he organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids, for each coating employed during the month shall be calculated using Equation 2 below;

$$H_c = \frac{(D_c)(W_c)}{V_s} \qquad (Eq.\ 2)$$

Where:

H_c= Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.

D_c= Density of coating, kg(lbs) coating per liter (gal) coating, determined according to 40 CFR 63.3941(c).

W_c= Mass fraction of organic HAP in the coating, kg (lbs) organic HAP per kg (lbs) coating, determined according to CFR 63.3941(a).

V_s= Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to CFR 63.3941(b).

c. the name and identification number of each thinners, additives, and cleaning/purge materials employed during the month; and

d. documentation that the thinners, additives, and cleaning/purge materials employed contained no HAPs as identified in section 112(b) of the Clean Air Act. Materials with an organic HAP content less than 1.0% by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass shall be considered to be Non-HAP containing materials.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3941)

(8) The permittee shall collect and record the following information each month for the emission unit:

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

b. the VOC content of each cleanup material, as applied;

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

d. the monthly VOC emission total (the summation of line b. X line c. for each coating and cleanup material employed); and

e. the updated, rolling twelve-month VOC emission total (the current monthly VOC emission rate recorded in line d. add to the previous 11 months VOC emission totals), in tons.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(9) 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 14-01893: d)(1) - d)(8). 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 record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each monthly record showing the use of non-complying coatings or clean-up materials. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-21-09(B) and 3745-77-07(A)(1))

(2) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation

(Authority for term: OAC rules 3745-17-11(C) and 3745-77-07(A)(1))

(3) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is the 6-month period ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of the specific compliance method used;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. if there were no deviations from the emission limitations in 63.3890(b)(1) or the requirement to employ non-HAP containing thinners, additives, and cleaning/purge materials, a statement that there were no deviations from the emissions limitations during the reporting period; and

g. if there were any deviations during the compliance period for the "compliant material" coating operations, the report shall include the following information;

h. an identification of each coating used that deviated from the applicable emission limit, and each thinner/additive, and cleaning material used that contained organic HAP and the dates and times each was used;

i. the calculation of the organic HAP content for each coating that deviated from the applicable limit, kg (lb) organic HAP per liter (gallon) of coating solids;

j. the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation; and

k. a statement of the cause of each deviation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3920)

(4) The permittee shall submit quarterly deviation (excursion) reports for any exceedence of the 17 TPY VOC emission limitation specified in b)(1)b.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit To Install 14-01893: e)(1) - e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitation:

The VOC content for each adhesive employed in this emissions unit shall not exceed 0.7 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

If required, USEPA Methods 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or ink, the permitee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

(Authority for term: OAC rules 3745-21-04 and 3745-77-07(A)(1))

b. Emission Limitation:

The organic HAP emissions from the existing general use coatings operations shall not exceed 2.6 lbs/gal of coating solids used during each rolling, 12-month period.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(7) above.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3941)

c. Emission Limitation:

Only Non-HAP thinners, additives, and cleaning/purge materials may be employed.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(7) above.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3941).

d. Emission Limitation:

VOC emissions shall not exceed 17 tons per year (TPY) based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in section d)(8) above.

(Authority for term: OAC rules 3745-31-05(A)(3), 3745-31-05(D) and 3745-77-07(C)(1))

e. Emission Limitation:

13.32 lbs of VOC/Hr.

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the maximum coating rate of 19.03 gallons per hour by the maximum VOC content of 0.7 lbs of VOC/Gallon (19.03 X 0.7 = 13.32).

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

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-01893: f)(1) The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

6. K009, Solid core coating line

Operations, Property and/or Equipment Description:

Solid core coating line (roll coating of water based adhesive on polystyrene door inserts)

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 operation(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 are identified below. 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)(3) (PTI 14-01919)	Volatile organic compounds (VOC) emissions shall not exceed 6.0 pounds per hour (lbs/hr)*. *The hourly VOC emission limitation outlined above is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with these limitations. VOC emissions shall not exceed 1.3 tons per year (TPY). See c)(1). The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(FF).
b.	OAC rule 3745-21-09(FF)(1)	The VOC content for each adhesive employed in this emissions unit shall not exceed 0.7 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The development and use of waterbase adhesives to replace the solvent line.

(Authority for term: OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the line:

a. the name and identification of each coating, as applied; and

b. the VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific “gallons/year” and “tons/year” limitations, or just a “tons/year” limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

(Authority for term: OAC rules 3745-21-09(B) and 3745-77-07(C)(1))

(2) The permittee shall collect and record the following information each month for the emission unit:

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

b. the VOC content of each cleanup material, as applied;

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

d. the monthly VOC emission total (the summation of line b. X line c. for each coating and cleanup material employed); and

e. the year-to date VOC emission total (the current monthly VOC emission rate recorded in line d. add to year-to-date monthly VOC emission totals), in tons.

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

(3) 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 14-01919: d)(1)-d)(2). 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 record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each monthly record showing the use of non-complying coatings or clean-up materials. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-21-09(B) and 3745-77-07(A)(1))

(2) The permittee shall submit quarterly deviation (excursion) reports for any exceedence of the 1.3 TPY VOC emission limitation specified in b)(1)a.

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

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit To Install 14-01919: e)(1) - e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitation:

The VOC content for each adhesive employed in this emissions unit shall not exceed 0.7 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

If required, USEPA Methods 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or ink, the permitee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

(Authority for term: OAC rules 3745-21-04 and 3745-77-07(A)(1))

b. Emission Limitation:

VOC emissions shall not exceed 1.3 tons per year (TPY).

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in section d)(2) above.

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

c. Emission Limitation:

6.0 lbs of VOC/Hr.

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the maximum coating rate of 8.57 gallons per hour by the maximum VOC content of 0.7 lbs VOC/Gallon (8.57 X 0.7 = 6.0).

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

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-01919:f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

7. K010, Grain Tech Paint Line

Operations, Property and/or Equipment Description:

Miscellaneous Metal Parts Paint Line w/ Dry Filtration System

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 operation(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 are identified below. 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)(3), as effective 11/30/01 (Permit to Install P0106828)	Volatile organic compounds (VOC) emissions from the application of coatings, clear coatings, and cleanup materials shall not exceed 351.82 pounds per day (lb/day). Particulate emissions (PE) or particulate matter emissions 10 microns and less in diameter (PM10) or particulate matter emissions 2.5 microns and less in diameter (PM2.5) shall not exceed 0.551 pound per hour and 2.41 TPY. The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average See b)(2)e. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1), OAC rule 3745-31-05(D) and 40 CFR Part 63, Subpart MMMM.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (Permit To Install P0106828)	See b)(2)h. below.
c.	OAC rule 3745-31-05(D) to avoid non-attainment new source review	VOC emissions shall not exceed 16.05 tons per year (TPY) from the application

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(Permit to Install P0106828)	of coatings and cleanup material used in this emissions unit, based on a rolling, 12-month summation. See c)(1) through c)(3) below.
d.	OAC rule 3745-21-09(U)(1)(a)	See b)(2)b. below.
e.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)c. below.
f.	40 CFR Part 63, Subpart MMMM (40 CFR 63.3880-63.3981) [In accordance with 40 CFR 63.3890(b)(1) this existing affected source is complying with the MACT through the use of compliant general use coatings]	The organic HAP emissions from the existing general use coatings operation shall not exceed 2.6 lbs/gal of coating solids used during each rolling, 12-month period. See b)(2)f. and c)(4) below.
g.	40 CFR 63.1-15 (40 CFR 63.3901)	As specified in 40 CFR 63.3901, Table 2 to 40 CFR Part 63, Subpart MMMM - Applicability of 40 CFR Part 63 General Provisions to Subpart MMMM, shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
h.	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 pound per hour average with regard to b)(1)b.
i.	OAC rule 3745-17-07(A)	The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average with regard to b)(1)b. For purposes of satisfying BAT, this limitation is equivalent to BAT as denoted in b)(1)a.

(1) Additional Terms and Conditions

a. The daily VOC emission limitation outlined above is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with these limitations.

b. The VOC content for each clear coating employed in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

c. The VOC content for each coating employed in this emissions unit that is dried at temperatures not exceeding two hundred degrees Fahrenheit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

d. The VOC content for each cleanup material employed in this emissions unit shall not exceed 7.3 pounds of VOC per gallon of cleanup material.

e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, OC content limitations and usage limitations.

f. The permittee, using the "compliant material" option, shall not apply any coating in the coating operation(s) with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.3890(b)(1); and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.3950, 63.3951, and 63.3952 for the compliance period. If required, the compliance calculations shall be performed on a monthly basis, as a rolling 12-month emission rate.

g. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, the 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 3745-31-05, then the mass PE, PM10, and PM2.5 emission limitations along with the visible particulate limitation in b)(1)a. no longer apply.

h. 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:

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) or particulate matter emissions 10 microns and less in diameter (PM10) or particulate matter emissions 2.5 microns and less in diameter (PM2.5) from this air contaminate source because the calculated annual emissions rate for PE, PM10 and PM2.5 is less than 10 tons per year, taking into account the federally enforceable rule limit of 0.551 pound of PE per hour under OAC rule 3745-17-11(B).

c) Operational Restrictions

(1) The amount of coating used in this emissions unit shall not exceed 5500 gallons, excluding water and exempt solvents per year. Compliance with the above limitation shall be based on a rolling, 12 month-summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

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

(2) The amount of clear coating used in this emissions unit shall not exceed 2200 gallons, excluding water and exempt solvents per year. Compliance with the above limitation shall be based on a rolling, 12 month-summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

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

(3) The amount of cleanup material used in this emissions unit shall not exceed 450 gallons per year. Compliance with the above limitation shall be based on a rolling, 12 month-summation. The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

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

(4) Every individual coating used in the "compliant coating operations" must meet the emission limitation(s) contained in 40 CFR 63.3890(b)(1); and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. Any coating operation meeting these limitations, for each material applied, shall not be required to meet the operating limits in 40 CFR 63.3892 or work practice standards in 40 CFR 63.3893.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the line:

a. the name and identification of each coating and cleanup material, as applied; and

b. the VOC content of each coating and cleanup material (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

(Authority for term: OAC rules 3745-21-09(B) and 3745-77-07(C)(1))

(2) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating employed during the month;

b. *the organic HAP content (*H_c *), as applied, of each coating employed. T*he organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids, for each coating employed during the month shall be calculated using Equation 2 below;

$$H_c = \frac{(D_c)(W_c)}{V_s} \qquad (Eq.\ 2)$$

Where:

H_c= Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.

D_c= Density of coating, kg(lbs) coating per liter (gal) coating, determined according to 40 CFR 63.3941(c).

W_c= Mass fraction of organic HAP in the coating, kg (lbs) organic HAP per kg (lbs) coating, determined according to CFR 63.3941(a).

V_s= Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to CFR 63.3941(b).

c. the name and identification number of each thinners, additives, and cleaning/purge materials employed during the month; and

d. documentation that the thinners, additives, and cleaning/purge materials employed contained no HAPs as identified in section 112(b) of the Clean Air Act. Materials with an organic HAP content less than 1.0% by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass shall be considered to be Non-HAP containing materials.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3941)

(3) The permittee shall collect and record the following information each month for the emission unit:

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

b. the VOC content of each coating and cleanup material, as applied;

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

d. the monthly usage totals for clear coat, non-clear coat, and cleanup materials employed;

e. the monthly VOC emission totals for the month (the summation of line b x line c for each coating and cleanup material employed);

f. the updated, rolling 12-month usage totals for all clear coat materials, non-clear coating materials, and cleanup materials employed, in gallons (the summation of the current months usage totals added to the previous 11-month usage totals); and

g. the updated, rolling 12-month total combined VOC emissions from all coatings and cleanup materials employed, in tons (the summation of the current months VOC emission totals added to the previous 11-month emission totals);.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05)

(4) 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 P0106828: d)(1)-d)(3). 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 record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each monthly record showing the use of non-complying coatings or clean-up materials. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-21-09(B) and 3745-77-07(A)(1))

(2) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is the 6-month period ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of the specific compliance method used;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. if there were no deviations from the emission limitations in 63.3890(b)(1) or the requirement to employ non-HAP containing thinners, additives, and cleaning/purge materials, a statement that there were no deviations from the emissions limitations during the reporting period; and

g. if there were any deviations during the compliance period for the "compliant material" coating operations, the report shall include the following information;

h. an identification of each coating used that deviated from the applicable emission limit, and each thinner/additive, and cleaning material used that contained organic HAP and the dates and times each was used;

i. the calculation of the organic HAP content for each coating that deviated from the applicable limit, kg (lb) organic HAP per liter (gallon) of coating solids;

j. the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation; and

k. a statement of the cause of each deviation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3920)

(3) The permittee shall submit quarterly deviation (excursion) reports for any exceedences of the following:

a. usage limitations specified in c)(1) - c(3); and.

b. the TPY VOC emission total specified in b)(1)c.

If no exceedances occurred, the permittee shall state so in the report.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(4) The permittee shall submit annual reports to the Hamilton County Department of Environmental Services quantifying the total VOC emissions from this emissions unit and the number of gallons of clear coat, non-clear coating material, and cleanup materials employed in this emissions unit. This report is due by January 31 of each year and shall cover the previous calendar year.

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

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit To Install P0106828: e)(1)-e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitations:

The VOC content for each clear coating employed in this emissions unit shall not exceed 4.3 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied; and

The VOC content for each coating employed in this emissions unit that is dried at temperatures not exceeding two hundred degrees Fahrenheit shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

If required, USEPA Methods 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or ink, the permitee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

(Authority for term: OAC rules 3745-21-09(U), 3745-21-04 and 3745-77-07(A)(1))

b. Emission Limitation:

The organic HAP emissions from the existing general use coatings operations shall not exceed 2.6 lbs/gal of coating solids used during each rolling, 12-month period.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(2) above.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3941)

c. Emission Limitation:

Only Non-HAP thinners, additives, and cleaning/purge materials may be employed.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(2) above.

(Authority for term: OAC rule 3745-77-07(C)(1)) 40 CFR 63.3941).

d. Emission Limitation:

VOC emissions shall not exceed 16.05 tons per year (TPY) from the application of coatings and cleanup material used in this emissions unit, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(3) above.

(Authority for term: OAC rules 3745-31-05 and (3745-77-07(C)(1))

e. Emission Limitation:

351.82 lbs of VOC/Day.

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the maximum hourly VOC emission rate of 14.65 lbs per hour by 24 hours per day (14.65 X 24 = 351.82).

See PTI 14-05897 for the calculation of the maximum hourly VOC emission rate.

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

f. Emission Limitation:

PE shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

The hourly PE rate limitation is based on Table 1 in OAC rule 3745-17-11.

To determine the worst case PE rate, the following equation shall be used:

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

where E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

Authority for Term: OAC rule 3745-17-11(B) and 3745-77-07(C)(1))

g. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations 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 3745-17-03(B)(1) and 3745-77-07(C)(1))

h. Emission Limitation:

Particulate emissions (PE) or particulate matter emissions 10 microns and less in diameter (PM10) or particulate matter emissions 2.5 microns and less in diameter (PM2.5) shall not exceed 2.41 TPY.

Applicable Compliance Method:

The annual PE, PM10 and PM2.5 emission rate is based on this emission unit's potential to emit. The annual PE, PM10 and PM2.5 emission rate is calculated by multiplying the maximum hourly emission rate by 8760 hours per year/2000 pounds per ton. The PM10 and PM2.5 emission rates are assumed to be less than or equal to the PE rate.

Authority for Term: OAC rule 3745-31-05 and 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0106828: f)(1) The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

8. K013 Frame Flow Coater Paint Line.

Operations, Property and/or Equipment Description:

Miscellaneous Metal Parts Paint Line-Flow Coater

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 operation(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 are identified below. 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)(3) (PTI P0105089)	Volatile organic compounds (VOC) emissions shall not exceed 42.09 pounds per hr (lb/hr)*. *The lbs/hr VOC emission limitation outlined above is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with these limitations. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-21-09(U)(1)(i), and 40 CFR Part 63, Subpart MMMM.
b.	OAC rule 3745-31-05(D) (PTI P0105089) Synthetic Minor Limitation to avoid non-attainment new source review.	VOC emissions shall not exceed 39.90 tons per year (TPY) based on a rolling, 12-month summation. See c)(2).
c.	OAC Rule 3745-21-09(U)(1)(i)	The VOC content for each coating employed in this emissions unit shall not exceed 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
d.	40 CFR Part 63, Subpart MMMM (40 CFR 63.3880-63.3981)	The organic HAP emissions from the existing general use coatings operation shall not exceed 1.9 lbs/gal of coating

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 40 CFR 63.3890(b)(1) this new source is complying with the MACT through the use of compliant general use coatings]	solids used during each rolling, 12-month period. See b)(2)a. and c)(1).
e.	40 CFR 63.1-15 (40 CFR 63.3901)	As specified in 40 CFR 63.3901, Table 2 to 40 CFR Part 63, Subpart MMMM - Applicability of 40 CFR Part 63 General Provisions to Subpart MMMM, shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The permittee, using the "compliant material" option, shall not apply any coating in the coating operation(s) with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.3890(b)(1); and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.3950, 63.3951, and 63.3952 for the compliance period. If required, the compliance calculations shall be performed on a monthly basis, as a rolling 12-month emission rate.

c) Operational Restrictions

(1) Every individual coating used in the "compliant coating operations" must meet the emission limitation(s) contained in 40 CFR 63.3890(b)(1); and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. Any coating operation meeting these limitations, for each material applied, shall not be required to meet the operating limits in 40 CFR 63.3892 or work practice standards in 40 CFR 63.3893.

(Authority for term: 40 CFR 63.3892(a), 40 CFR 63.3893(a), and OAC rule 3745-77-07(A)(1))

(2) The amount of coating employed in this emission unit shall not exceed 26,600 gallons per year based on a rolling 12-month summation.

(Authority for term: OAC rules 3745-31-05(D) and 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the line:

a. the name and identification of each coating, as applied; and

b. the VOC content of each coating (excluding water and exempt solvents), as applied.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

(Authority for term: OAC rules 3745-21-09(B) and 3745-77-07(C)(1))

(2) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating employed during the month;

b. *the organic HAP content (*H_c *), as applied, of each coating employed. T*he organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids, for each coating employed during the month shall be calculated using Equation 2 below;

$$H_c = \frac{(D_c)(W_c)}{V_s} \qquad (Eq.\ 2)$$

Where:

H_c= Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.

D_c= Density of coating, kg(lbs) coating per liter (gal) coating, determined according to 40 CFR 63.3941(c).

W_c= Mass fraction of organic HAP in the coating, kg (lbs) organic HAP per kg (lbs) coating, determined according to CFR 63.3941(a).

V_s= Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to CFR 63.3941(b).

c. the name and identification number of each thinners, additives, and cleaning/purge materials employed during the month; and

d. documentation that the thinners, additives, and cleaning/purge materials employed contained no HAPs as identified in section 112(b) of the Clean Air Act. Materials with an organic HAP content less than 1.0% by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass shall be considered to be Non-HAP containing materials.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3941)

(3) The permittee shall collect and record the following information each month for the emission unit:

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

b. the VOC content of each cleanup material, as applied;

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

d. the monthly VOC emission total (the summation of line b. X line c. for each coating and cleanup material employed); and

e. the updated, rolling 12-month VOC emission total (the current monthly VOC emission rate recorded in line d. add to the previous 11 months VOC emission totals), in tons.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(4) 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 P0105089: d)(1)-d)(3). 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 record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each monthly record showing the use of non-complying coatings or clean-up materials. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days following the end of the calendar month.

(Authority for term: OAC rules 3745-21-09(B) and 3745-77-07(A)(1))

(2) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is the 6-month period ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of the specific compliance method used;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. if there were no deviations from the emission limitations in 63.3890(b)(1) or the requirement to employ non-HAP containing thinners, additives, and cleaning/purge materials, a statement that there were no deviations from the emissions limitations during the reporting period;

g. if there were any deviations during the compliance period for the "compliant material" coating operations, the report shall include the following information;

h. an identification of each coating used that deviated from the applicable emission limit, and each thinner/additive, and cleaning material used that contained organic HAP and the dates and times each was used;

i. the calculation of the organic HAP content for each coating that deviated from the applicable limit, kg (lb) organic HAP per liter (gallon) of coating solids;

j. the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation; and

k. a statement of the cause of each deviation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3920)

(3) The permittee shall submit quarterly deviation (excursion) reports for any exceedences of the following:

a. the usage limitation specified in c)(2); and

b. the TPY of VOC emission limitation specified in b)(1); and

If no exceedances occurred, the permittee shall state so in the report.

(Authority for term: OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(4) The permittee shall submit annual reports to the Hamilton County Department of Environmental Services quantifying the total VOC emissions from this emissions unit. This report is due by January 31 of each year and shall cover the previous calendar year.

(Authority for term: OAC rules 3745-77-07(C)(1))

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit To Install P0105089: e)(1)- e)(4). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitation:

The VOC content for each coating employed in this emissions unit shall not exceed 3.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

If required, USEPA Methods 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or ink, the permitee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

(Authority for term: OAC rules 3745-21-09(U). 3745-21-04 and 3745-77-07(A)(1))

b. Emission Limitation:

The organic HAP emissions from the existing general use coatings operations shall not exceed 1.9 lbs/gal of coating solids used during each rolling, 12-month period.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(7) above.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.3941)

c. Emission Limitation:

Only Non-HAP thinners, additives, and cleaning/purge materials may be employed.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(7) above.

(Authority for term: OAC rule 3745-77-07(C)(1)) and 40 CFR 63.3941).

d. Emission Limitation:

VOC emissions shall not exceed 39.90 tons per year (TPY) based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(8) above.

(Authority for term: OAC rule 3745-31-05(D) and 3745-77-07(C)(1))

e. Emission Limitation:

42.09 lbs of VOC/Hr.

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the maximum coating rate of 14.03 gallons per hour by the maximum VOC content of 3.0 lbs of VOC/Gallon (14.03 X 3.0 = 42.09).

(Authority for term: OAC rule 3745-31-05(D) and 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0105089: f)(1) The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

9. R014, Phenolic resin impregnation

Operations, Property and/or Equipment Description:

Phenolic resin coating line.

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 operation(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 are identified below. 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 3745-21-07(G)	Exempt, see b)(2)a.

(2) Additional Terms and Conditions

a. This emissions unit currently does not employ any photochemically reactive materials as defined in OAC Rule 3745-21-07(G). It is, therefore, exempt from all emission limitations and control requirements specified in OAC 3745-21-07(G).

b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following term and condition shall become void after U.S. EPA approves the rule revision: b)(2)a. and e)(1).

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. Once U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan, this emissions unit will not be subject to any of the applicable provisions listed in the revised OAC rule 3745-21-07.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) Prior to employing any photochemically reactive material in this emissions unit, including any cleanup material that is a photochemically reactive material, the permittee shall provide written notification to the appropriate Ohio EPA Field Office. Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC 3745-21-07(G). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour and pounds per day.

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

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.