



Environmental  
Protection Agency

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

12/29/2010

Certified Mail

Jerry Lillie  
Hadlock Plastics LLC  
110 North Eagle St.  
Geneva, OH 44041-1196

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0204030272  
Permit Number: P0107288  
Permit Type: Initial Installation  
County: Ashtabula

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: U.S. EPA  
Ohio EPA-NEDO; Pennsylvania; Canada





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Hadlock Plastics LLC**

Facility ID:	0204030272
Permit Number:	P0107288
Permit Type:	Initial Installation
Issued:	12/29/2010
Effective:	12/29/2010





Division of Air Pollution Control
Permit-to-Install
for
Hadlock Plastics LLC

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## Authorization

Facility ID: 0204030272  
Facility Description: FRP Manufacturing and Coating  
Application Number(s): A0040782  
Permit Number: P0107288  
Permit Description: Installation of Coating Booth  
Permit Type: Initial Installation  
Permit Fee: \$200.00  
Issue Date: 12/29/2010  
Effective Date: 12/29/2010

This document constitutes issuance to:

Hadlock Plastics LLC  
110 North Eagle St.  
Geneva, OH 44041-1196

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

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

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 43087  
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director

## Authorization (continued)

Permit Number: P0107288  
Permit Description: Installation of Coating Booth

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

<b>Emissions Unit ID:</b>	<b>R011</b>
Company Equipment ID:	R011
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

## **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.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

**2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. 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 re-issuance, or modification.

- 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, revoked, or revoked and reissued, for cause. 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 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.

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

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (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.
- 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, 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written 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. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 5. 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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## 6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.



- c) 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 ORC section 3704.08.
  - (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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office 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.

**7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

**8. 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.

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this

permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. 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.)

## 10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

## 11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## 12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## 13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## 14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

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

**16. 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. Risk Management Plans**

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

**19. 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.

## **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.

## **C. Emissions Unit Terms and Conditions**

**1. R011, Coating Booth**

**Operations, Property and/or Equipment Description:**

Coating Booth

- 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)	The Best Available Technology (BAT) determination is compliance with 40 CFR Part 63, Subpart PPPP.
b.	OAC rule 3745-21-07(G)	Emissions of photochemically reactive organic compounds shall not exceed 8 pounds per hour and 40 pounds per day. See b)(2)a.
c.	OAC rule 3745-17-11(C)	See b)(2)b, c)(1) and c)(2).
d.	40 CFR 63, subpart PPPP	The organic HAP emissions from the new general use coatings operation shall not exceed: 0.16 kg/kg of coating solids used during each rolling, 12-month period; or 0.16 lb/lb of coating solids used during each rolling, 12-month period.  See b)(2)c, b)(2)d, b)(2)e, c)(3), c)(4) and c)(5).
e.	40 CFR Part 63, Subpart A	Table 2 to Subpart PPPP of Part 63 - Applicability of General Provisions (Subpart A) to Subpart PPPP of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. 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 requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)b, d)(1), e)(1)a, e)(1)b and f)(1).

[OAC rule 3745-21-07]

- b. 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.

[OAC rule 3745-17-11(C)]

- c. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart PPPP.

The final rules found in 40 CFR Part 63, Subpart PPPP establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for plastic parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of plastic parts and products:

- i. all coating operations as defined in 40 CFR 63.4581;
- ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and
- iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee shall be subject to this NESHAP upon the startup of the coating operations. The first day of operations shall begin the initial compliance period, which shall end on the last day of the 12th month following the compliance date, or the last day of the 12th month following the month including the compliance date, if startup operations do not begin on the first day of the month.

[40 CFR 63.4483, 40 CFR 63.4482(b), and 40 CFR 63.4540]

- d. The permittee, when 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 63.4490; 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 63.4551 and 63.4552 for the compliance period.

[40 CFR 63.4491(a), 40 CFR 63.4540, 40 CFR 63.4541, and 40 CFR 63.4542]

- e. For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.4490 by using the “without add-on control” option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.4551 and 63.4552.

[40 CFR 63.4500(a)], [40 CFR 63.4550], [40 CFR 63.4551], and [40 CFR 63.4552]

c) **Operational Restrictions**

- (1) The permittee shall install and operate a 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.

[OAC rule 3745-17-11(C)(1) and (2)(b) and OAC rule 3745-77-07(C)(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.

[OAC rule 3745-17-11(C)(2)(e)]

- (3) Every individual coating used in the “compliant coating operations” must meet the emission limitation(s) contained in 40 CFR 63.4490; 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 63.4492 or work practice standards in 40 CFR 63.4493.

[40 CFR 63.4492(a) and 40 CFR 63.4493(a)]

- (4) If the permittee can meet the emission limitation(s) contained in 40 CFR 63.4490 without add-on controls, by calculating the rolling, 12-month HAP emission rate at the end of each month, the permittee shall not be required to meet the operating limits contained in 40 CFR 63.4492 or work practice standards contained in 40 CFR 63.4493.

[40 CFR 63.4492(a)] and [40 CFR 63.4493(a)]

- (5) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the Director (Ohio EPA Northeast District Office), which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or other standard operating procedures), operation and maintenance records, and inspection of the facility.

[40 CFR 63.6(e)(1)]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information for each day for the coating operation:
- a. the company identification for each coating and photochemically reactive cleanup material employed;
  - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
  - c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
  - d. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
  - e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
  - f. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and

photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of “photochemically reactive” and “nonphotochemically reactive” are based upon OAC rule 3745-21-01(C)(5).]

[OAC rule 3745-21-07(G)(2)]

- (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 Ohio EPA Northeast District Office upon request.

[OAC rule 3745-17-11(C)(2)(a)]

- (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.

[OAC rule 3745-17-11(C)(2)(c)]

- (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.

[OAC rule 3745-17-11(C)(2)(c)]

- (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 Ohio EPA Northeast District Office upon request.

[OAC rule 3745-17-11(C)(2)(d) and (f)]

- (6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was 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.

[OAC rule 3745-17-11(C)(2)(e),(f) and (g) for OAC rule 3745-17-11(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, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the plastic parts coating operation(s), including at a minimum:
    - i. information from the supplier or manufacturer,
    - ii. formulation data and/or coating/material testing data,
    - iii. all data, documentation, and/or calculations needed to demonstrate that each coating meets the limits contained in 40 CFR 63.4490 and that each thinner, additive, and cleanup material applied in the plastic parts coating operations contained no organic HAP\*;
  - b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;
  - c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;
  - d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:
    - i. Method 311 from 40 CFR Part 63, Appendix A;
    - ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP;
    - iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pounds HAP/gallon of material ÷ pounds/gallon of material, or calculated in kg/liter); or
    - iv. solvent blends listed as single components and where neither test data nor manufacturer's data is available, default values from Table 3 to Subpart PPPP or Table 4 if not listed in Table 3, can be used.
  - e. the mass fraction of coating solids (pound of coating solids/pound of coating or kg of coating solids /kg coating) for each coating applied, determined using one of the following methods:

- i. Method 24 from 40 CFR Part 60, Appendix A; or
  - ii. information from the supplier or manufacturer of the coatings, where the mass fraction of coating solids can be calculated from the density and the mass of solids per gallon of each material (pound solids/gallon of coating ÷ pounds/gallon of coating, or calculated in kg/kg).
- f. if using the compliant material option, the organic HAP content of each coating, in pound of organic HAP emitted per pound of coating solids used or kg of organic HAP emitted per kg of coating solids used, calculated as follows for each coating applied in the plastic parts coating operations using the “compliant material” option:

$$H_c = W_c / S_c$$

where:

$H_c$  is the organic HAP content of coating “c”, in kg organic HAP emitted per kg of coating solids used or pound of organic HAP emitted per pound of coating solids used.

$W_c$  is the mass fraction of organic HAP in coating “c”, kg HAP per kg coating or pound of HAP per pound of coating, as determined in (d) above.

$S_c$  is the mass fraction of coating solids in coating “c”, kg coating solids per kg coating or pound of coating solids per pound of coating, as determined in (e) above; and

- g. if using the compliant material option, all calculations required by this permit for each rolling 12-month compliance period.

In order to demonstrate continuous compliance, the calculated organic HAP content ( $H_c$ ) for each coating used must be less than or equal to the applicable emission limit in 40 CFR 63.4490; and each thinner and/or other additive, and cleaning material used during the each compliance period (each month) must contain no organic HAP. These records shall constitute a separate initial compliance demonstration for each coating applied.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

\* No organic HAP means no HAP at 1.0% or more 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.

- h. If using the uncontrolled option, the total mass of organic HAP (pound or kg) in all of the coatings, thinners/additives, and cleanup/purge materials (as purchased) applied during the month, calculated separately for coatings, thinners/additives, and cleanup/purge materials as follows:

$$HAP = \sum_{i=1}^r (VOL_i) (D_i) (W_i)$$

where:

HAP is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials used each month, in pound or kg of HAP for each: 1. the coatings (HAP<sub>c</sub>), 2. thinners/additives (HAP<sub>t</sub>), and 3. cleanup/purge materials (HAP<sub>cu</sub>).

VOL<sub>i</sub> is the volume of material “i” documented in (b) above, in gallons or liters.

D<sub>i</sub> is the density of material “i” as documented in (c) above, in pounds/gallon or kg/liter.

W<sub>i</sub> is the mass fraction of organic HAP in material “i” as calculated in (d) above, in pound/pound or kg/kg.

r is the number of coatings, the number of thinners/additives, or the number of cleanup/purge materials used during the month, each source (coating, thinner/additive, cleanup/purge) calculated separately for its HAP.

- i. the total mass of organic HAP emissions for each month, calculated as follows:

$$HAP_{TOT} = HAP_c + HAP_t + HAP_{cu} - R_w$$

where:

HAP<sub>TOT</sub> is the total mass of organic HAP emissions for the month, in pound or kg.

HAP<sub>c</sub> is the total mass of organic HAP in all the coatings used during the month, summed from the total mass of HAP calculated from all the coatings applied, as required in (f) above, in pound or kg.

HAP<sub>t</sub> is the total mass of organic HAP in all the thinners and additives used during the month, summed from the total mass of HAP calculated from all the thinners/additives applied, as required in (f) above, in pound or kg.

HAP<sub>cu</sub> is the total mass of organic HAP in all cleanup and purge materials used during the month, summed from the total mass of HAP calculated from all the cleanup/purge materials applied, as required in (f) above, in pound or kg.

R<sub>w</sub> is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste treatment, storage, and disposal facility (TSDF) for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to R<sub>w</sub> if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for recovery or disposal).

- j. the total mass of coating solids applied during the month, calculated as follows:

$$M_s = \sum_{h=1}^m (VOL_h) (D_h) (M_h)$$

where:

$M_s$  is the total mass of coating solids used during the month, in pound or kg.

$VOL_h$  is the total volume of coating “h” used during the month, as documented in (b) above, in gallons or liters.

$D_h$  is the density of coating “h”, as documented in (c) above, in pounds/gallon or kg/liter.

$M_h$  is the mass fraction of coating solids for coating “h”, pound of solids per pound of coating or kg of solids per kg coating, calculated as required in (e) above.

$m$  is the number of coatings applied during the month.

- k. the total organic HAP emission rate for the 12-month compliance period, in pound of HAP per pound of coating solids or kg of HAP per kg of coating solids applied during the rolling, 12-month compliance period, calculated as follows:

$$HAP_{comply} = \sum_{y=1}^n (HAP_{TOT, y}) / \sum (M_{s, y})$$

where:

$HAP_{comply}$  is the total organic HAP emission rate for the 12-month compliance period, in pound organic HAP emitted per pound of coating solids applied or kg organic HAP emitted per kg of coating solids applied.

$HAP_{TOT, y}$  is the total mass of organic HAP emissions from all materials used during month  $y$ , calculated in (g) above, in pound or kg.

$M_{s, y}$  is the total mass of coating solids used during month  $y$ , calculated in (h) above, in pound or kg.

$y$  is the identifier for the month.

$n$  is the number of full or partial months in the compliance period; for the initial compliance period,  $n$  equals 13 where the compliance date does not fall on the first day of the month; for all following compliance periods  $n$  equals 12; and

- l. all calculations required above for each monthly rolling, 12-month compliance period.

In order to demonstrate continuous compliance, the organic HAP emission rate for each rolling, 12-month compliance period must be less than or equal to the applicable emission limit in 40 CFR 63.4490. The compliance demonstration

shall be conducted on a monthly basis, using the data from the previous 12 months of operation, as documented through the above calculations and records.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

[40 CFR 63.4530, 40 CFR 63.4531, 40 CFR 63.4540, 40 CFR 63.4541, 40 CFR 63.4542, 40 CFR 63.4550, 40 CFR 63.4551 and 40 CFR 63.4552]

- (8) If using the allowance for an emission reduction of the uncontrolled/pre-controlled emissions for organic HAP contained in waste materials sent to (or designated for shipment to) a hazardous waste treatment, storage, and disposal facility (TSDF) during the month, the permittee shall maintain records of the following information:
- a. the name and address of each hazardous waste TSDF to which waste materials were sent or are scheduled to be sent, and for which an allowance was applied to the calculated uncontrolled/pre-controlled emissions;
  - b. a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to each hazardous waste TSDF facility;
  - c. for each allowance applied in any month:
    - i. the volume, weight, and source of recovered material collected and an identification of the coating operations producing the waste materials;
    - ii. the month the allowance was applied and the mass of organic HAP used as the allowance, including the calculations;
    - iii. the date the recovered material was shipped and its volume and weight (excluding the weight of the container) at the time of shipment to the hazardous waste TSDF and the manifest number accompanying the shipment;
    - iv. the methodology used to determine the total amount of waste materials collected;
    - v. the methodology used to determine the mass of organic HAP contained in the wastes, sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment; and
  - d. for each container of recovered materials shipped to a hazardous waste TSDF, the following records shall be maintained in a log:
    - i. the date each container was first used and the date of the last addition;
    - ii. the date and amount of recovered materials added, from first to the last addition;

- iii. the date the container was shipped and identification of which hazardous waste TSDf it was shipped to, if more than one facility in (a) above; and
- iv. the volume and weight of the material as it was recorded on the waste manifest (minus the weight of the container, if included).

[40 CFR 63.4551(e)(4) and 40 CFR 63.4530(g)]

- (9) The permittee shall also maintain the following records for the plastic parts coating line:
- a. a copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.4490 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;
  - b. if using the predominant activity alternative under 40 CFR 63.4490(c)(1), the records of the data and calculations used to determine the predominant activity;
  - c. if using the “facility-specific” emission limit under 40 CFR 63.4490(c)(2), the data used to calculate the “facility-specific” emission limit; and
  - d. the date, time, and duration of use, and the amount of any material applied in the compliant coating operations that did not meet the requirements of the “compliant material” option.

If demonstrating compliance with a predominant activity determination or a “facility-specific” emission limit, all coating operations included in the predominant activity determination or calculation of the “facility-specific” emission limit must comply with the applicable limit and requirements for the “compliant material” option.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting the Ohio EPA Northeast District Office contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

[40 CFR 63.4530(a) and 40 CFR 63.4531]

- (10) The permittee shall maintain records to demonstrate that the organic HAP content of each coating used in the coating operation is less than or equal to the applicable limitation contained in this NESHAP and permit; and that no thinner, additive, and/or cleanup/purge material used in the coating operations contains organic HAP at 1.0% or more 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. Each record shall be maintained for 5 years following the date of application of the coating.

[40 CFR 63.4491(a), 40 CFR 63.4541, 40 CFR 63.4542, and 40 CFR 63.4531]

## e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;  
  
[OAC rule 3745-21-07(G)(2)]
  - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.  
  
[OAC rule 3745-21-07(G)(2)]
  - c. 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 was in operation.  
  
[OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C)]

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

- (2) The permittee shall submit an initial notification of compliance status report no later than 30 calendar days following the end of the initial compliance period (documented in b)(2)c of this permit). The initial notification of compliance 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 compliance method for each coating operation, i.e., if using "compliant materials" or if calculating the monthly mass of organic HAP emissions; and a statement as to if cleanup solvents were collected for recovery or disposal and if they were shipped to a certified hazardous waste TSDF;
  - e. a statement as to whether each coating met the emission limitation for the initial compliance period and if any thinner, additive, and/or cleanup material contained any organic HAP;

- f. if there was a deviation during the initial compliance period, a description of the deviation and statement of the cause and the calculations of emissions used to determine noncompliance with the applicable limits;
  - g. calculations and/or supporting documentation (information from supplier or manufacturer or summary of testing results) for the following:
    - i. mass fraction of organic HAP for one representative coating, one thinner and/or additive, and one cleanup/purge material;
    - ii. the mass fraction of coating solids for the representative coating;
    - iii. the density for the representative coating; and
    - iv. the calculation of the organic HAP content for the representative coating, for demonstration of compliance with the limitation, in kg (lb) organic HAP per kg (lb) of coating solids;
  - h. for coating operations meeting the emissions limitation without add-on controls, the calculations of the total organic HAP emission rate for the 12-month compliance period, from the coatings, thinners/additives, and cleaning materials used each month, to include:
    - i. the calculations of the total mass of coating solids used each month;
    - ii. the calculations of the total mass of organic HAP emissions for each month; and
    - iii. the calculation of the initial 12-month organic HAP emission rate;
  - i. if using the predominant activity alternative under 40 CFR 63.4490(c)(1), the data and calculations used to determine the predominant activity; and
  - j. if using the "facility-specific emission limit" alternative under 40 CFR 63.4490(c)(2), the calculation of the "facility-specific" emission limitation.  
  
[40 CFR 63.9(h) and 40 CFR 63.4510(c)]
- (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 compliance method as either the “compliant material” option or the “without add-on control” option;
- e. statement of whether the affected source achieved the emission limitations for the compliance period;
- f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period for the uncontrolled coating operations or the limitation from 40 CFR 63.4490 for each type of compliant coating applied;
- g. if using the predominant activity alternative according to 40 CFR 63.4490(c)(1), the annual determination of predominant activity if it was not included in the previous semi-annual compliance report;
- h. if using the “facility-specific emission limit” alternative according to 40 CFR 63.4490(c)(2), the calculation of the “facility-specific” emission limit for each 12-month compliance period during the 6-month reporting period;
- i. if there were no deviations from the emission limitations in 63.4490, a statement that there were no deviations from the emissions limitations during the reporting period; and
- j. if there were any deviations during the compliance period for the “compliant material” coating operations, the report shall include the following information:
  - i. 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;
  - ii. 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;
  - iii. the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation; and
  - iv. a statement of the cause of each deviation.

[40 CFR 63.4520(a)]

- (4) The permittee shall include the following information in the semiannual report for any monthly record where the allowance for an emission reduction was applied in the uncontrolled HAP emissions calculations for materials that were shipped (or scheduled to be shipped) to a hazardous waste TSDF:
- a. any monthly record where measurements were not taken or appropriate records were not maintained for recovered material(s) that were applied as an emission reduction in the calculated HAP emissions before add-on controls and used to demonstrate compliance with the NESHAP and the limitations in this permit;
  - b. any record of recovered solvent that was not finally shipped to a hazardous waste TSDF and/or was shipped to a TSDF not regulated under 40 CFR Parts

262, 264, 265, or 266 and which was also applied as an emission reduction to HAP emissions prior to add-on controls;

- c. any record of discrepancy between the total volume or weight of material(s) collected and the total volume shipped to a hazardous waste TSDF, as documented in the recovered materials log;
- d. any record of recovered material being applied more than one time in a monthly compliance demonstration; and/or
- e. a miscalculation of the HAP emission reduction calculation for recovered materials sent to a hazardous waste TSDF.

[40 CFR 63.4551(e)(4)] and [40 CFR 63.4530(g)]

- (5) The permittee shall identify in the semiannual reports any period of time where a coating was applied that exceeded the organic HAP content limitation contained in this NESHAP and/or a thinner, additive, and/or cleaning/purge material was applied that contained organic HAP as defined in this permit. If the permittee employed a noncompliant coating, the permittee shall identify any exceedance of the rolling 12-month average. The report shall identify for which compliance option the permittee has demonstrated compliance. The report shall document the date and duration of the exceedance, as well as the mass average organic HAP content calculation for the compliance period during which the exceedance occurred.

[40 CFR 63.4520(a)(5) and 40 CFR 63.4542(b)]

f) Testing Requirements

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

- a. Emission Limitation:

Emissions of photochemically reactive organic compounds shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method:

Compliance shall be demonstrated by the monitoring and record keeping specified in d)(1).

- b. Emission Limitation:

The organic HAP emissions from the new or reconstructed general use coatings operations shall not exceed:

0.16 kg/kg of coating solids used during each rolling, 12-month period; or

0.16 lb/lb of coating solids used during each rolling, 12-month period.

Applicable Compliance Method:



Compliance shall be demonstrated by the monitoring and record keeping specified in d)(7), d)(8), d)(9) and d)(10).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.