



Environmental
Protection Agency

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

1/7/2011

Ms. Angela Jones
Rubber Seal
5751 N. Webster Street
Dayton, OH 45414

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0857733184
Permit Number: P0106885
Permit Type: Initial Installation
County: Montgomery

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Dayton Daily News. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,


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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
RAPCA; Indiana; Kentucky

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Rubber Seal

Issue Date: 1/7/2011
Permit Number: P0106885
Permit Type: Initial Installation
Permit Description: Initial Installation FEPTIO for three sandmills already installed and operating.
Facility ID: 0857733184
Facility Location: Rubber Seal
5751 N. WEBSTER STREET,
Dayton, OH 45414
Facility Description: Paint and Coating Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Stephanie Madden at Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280 or (937)225-4435. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

This permit is being issued as a Federally Enforceable Permit to Install and Operate (FEPTIO) for three sandmills (P019, P020 and P021). P019 and P020 are each 25 horsepower sandmills and P021 is a 40 horsepower sandmill. Coatings are processed through the sandmills to improve coating texture. The mills use a chilled system to reduce solvent evaporative losses and the coatings are pumped from one vessel and run through the mill while the processed coating is pumped into a collection vessel. The vessels are kept closed to further minimize solvent losses.

3. Facility Emissions and Attainment Status:

Rubber Seal is located in Montgomery County which is currently in attainment for all criteria pollutants except PM 2.5, which is classified as basic nonattainment. With the issuance of this PTIO and P0106883, the facility wide allowable emissions will be 36.20 TPY VOC, 9.9 tons of any individual HAP and 24.9 tons of total HAPs.

4. Source Emissions:

Potential VOC emissions from each individual sandmill are 47.22 TPY. This permit will be issued in draft and will have federally enforceable limitations in order to restrict potential VOC emissions. The permittee has accepted an annual process limit of 35,000 gallon per year, as a rolling 12-month summation for P019, P020 and P021 combined to limit VOC emissions to 1.26 TPY. This PTIO will also include synthetic minor restrictions for HAPs based on facility wide limitations of 9.9 tons of any individual HAP, as a rolling, 12-month summation and 24.9 tons of total HAPs, as a rolling 12-month summation, from all emissions units at the facility. In order to demonstrate compliance with these limitations, the permittee shall maintain monthly records of the individual HAP emission rates for each HAP as well as the total HAP emission rates from all emissions units at the facility. Quarterly deviation reports shall be submitted to identify any exceedances of the 12 month rolling annual process limit, the 12-month rolling annual VOC emissions limitation and the 12-month rolling HAP emission limitations.

5. Conclusion:

The terms and conditions in this Federally Enforceable Permit to Install and Operate will limit emissions from P019, P020 and P021 to 1.26 TPY. The combined maximum amount of coatings processed in the sandmills will be limited to 35,000 gallons per year. Additionally, limiting the HAP emissions to 9.9 TPY of an individual HAP and 24.9 TPY of any combination of HAPs through federally enforceable terms and conditions and record keeping requirements, will prevent Rubber Seal from triggering Title V or MACT permitting requirements.

6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	<u>1.26</u>
<u>Individual HAP</u>	<u>9.9</u>
<u>Combined HAP</u>	<u>24.5</u>



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Rubber Seal**

Facility ID:	0857733184
Permit Number:	P0106885
Permit Type:	Initial Installation
Issued:	1/7/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Rubber Seal

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Authorization

Facility ID: 0857733184
Application Number(s): A0039028
Permit Number: P0106885
Permit Description: Initial Installation FEPTIO for three sandmills already installed and operating.
Permit Type: Initial Installation
Permit Fee: \$1,200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 1/7/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Rubber Seal
5751 N. WEBSTER STREET
Dayton, OH 45414

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

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

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0106885

Permit Description: Initial Installation FEPTIO for three sandmills already installed and operating.

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

Group Name: Sand Mills

Emissions Unit ID:	P019
Company Equipment ID:	#19 Sand Mill 1
Superseded Permit Number:	
General Permit Category and	Not Applicable
Type:	
Emissions Unit ID:	P020
Company Equipment ID:	#20 Sand Mill 2
Superseded Permit Number:	
General Permit Category and	Not Applicable
Type:	
Emissions Unit ID:	P021
Company Equipment ID:	#21 Sand Mill 3
Superseded Permit Number:	
General Permit Category and	Not Applicable
Type:	

Draft Permit-to-Install and Operate

Rubber Seal

Permit Number: P0106885

Facility ID: 0857733184

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

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

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

7. What reports must I submit under this permit?

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

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

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Regional Air Pollution Control Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

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

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

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

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

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

Draft Permit-to-Install and Operate

Rubber Seal

Permit Number: P0106885

Facility ID: 0857733184

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions

Draft Permit-to-Install and Operate

Rubber Seal

Permit Number: P0106885

Facility ID: 0857733184

Effective Date: To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

Draft Permit-to-Install and Operate

Rubber Seal

Permit Number: P0106885

Facility ID: 0857733184

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Sand Mills: P019, P020, P021,

EU ID	Operations, Property and/or Equipment Description
P019	#19 Sand Mill 1, 25 hsp
P020	#20 Sand Mill 2, 25 hsp
P021	#21 Sand Mill 3, 40 hsp

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

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

a. None.

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

a. b)(1)b., c)(1), d)(2), d)(3), e)(1) and f)(1)b. through f)(1)d.

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)	<p>Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 10.78 lbs/hr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).</p>
b.	<p>OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and 40 CFR Part 63, Subpart HHHHH National Emission Standard for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing)</p>	<p>The combined annual VOC emissions from emissions units P019, P020 and P021, combined, shall not exceed 1.26 tons per year (TPY) based upon a rolling, 12-month summation.</p> <p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001, P002, P003, P004, P005, P006, P007, P008,</p>

Draft Permit-to-Install and Operate

Rubber Seal

Permit Number: P0106885

Facility ID: 0857733184

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		P009, P010, P011, P012, P013, P019, P020 P021, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation. See b)(2)b. and c)(1).
c.	OAC rule 3745-21-07(G)(2)	This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234. As per "The White Rubber Corporation v. Director (ERAC Case No. 675153)" decision, OAC rule 3745-21-07(G) shall not apply to an operation that is purely a mixing process with no chemical manufacturing or chemical reaction occurring. See b)(2)c.

(2) Additional Terms and Conditions

- a. The hourly VOC emissions limits were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.
- b. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit. The emissions of VOCs from emissions units P019, P020 and P021 combined, shall not exceed 1.26 TPY, based upon a rolling, 12-month summation of the emissions.
- c. 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 terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)c.

c) Operational Restrictions

- (1) The maximum amount of coatings processed through emissions units P019, P020 and P021, combined, shall not exceed 35,000 gallons per year, based upon a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for each sandmill:
 - a. The company identification for each coating processed in the sandmill.
 - b. The number of gallons of each coating processed in the sandmill.
 - c. The total number of gallons of coating processed in the sandmill.
 - d. The VOC content of each coating processed in the sandmill, in pounds per gallon.
 - e. The total VOC emission rate for all coatings processed in the sandmill, in pounds per month, calculated by multiplying the number of gallons of each coating processed in the sandmill, the VOC content of the coating processed in the sandmill and the facility-determined mass balance loss factor of 1.1% lbs of VOC loss/lbs of VOC in product (i.e., d)(1)c. x d)(1)d. x 0.011).
- (2) The permittee shall maintain monthly records of the following information for emissions units P019, P020 and P021, combined:
 - a. The rolling, 12-month summation of VOC emissions, in tons.; and
 - b. The rolling, 12-month summation of the number of gallons of coatings processed in the sandmills.
- (3) The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P019, P020 and P021):
 - a. The name and identification number of each coating, primer, undercoat, and intermediate produced.
 - b. The individual HAP* content for each HAP of each coating, primer, undercoat, and intermediate produced, in pounds of individual HAP per gallon of coating.
 - c. The number of gallons of each coating, primer, undercoat, and intermediate produced.
 - d. The name and identification of each cleanup material employed.

- e. The individual HAP* content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material.
- f. The number of gallons of each cleanup material employed.
- g. The number of gallons of cleanup material recovered for disposal.
- h. The total individual HAP emissions for each HAP from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month. (i.e., the sum of [d)(3)b.) x (d)(3)c.) x (appropriate loss factor)] + [d)(3)e. x (d)(3)f. - d)(3)g.) x (appropriate loss factor for clean up materials**)] for each individual HAP, divided by 2,000 lbs/ton.)
- i. The rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.
- j. The total combined HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials as determined in d)(3)h).
- k. The rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA district office or local air agency contact. This information does not have to be kept on a line-by-line basis.

**The appropriate loss factor for cleanup materials shall be based upon the most recent results of the annual mass balance study of the cleanup emissions required in 2.f)(2) of P0106883.

- (4) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified federally enforceable permit-to-install and operate (FEPTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. all exceedances of the rolling, 12-month emission limitation for VOCs;
 - ii. all exceedances of the rolling, 35,000 gallon coating usage restriction; and
 - iii. all exceedances of the rolling, 12-month individual HAP emission limitation and of the rolling, 12-month total combined HAPs emission limitation.
- b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

f) Testing Requirements

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

- a. Emission Limitation

VOC emissions from this emissions unit shall not exceed 10.78 lbs/hr.

- Applicable Compliance Method

Compliance with the hourly allowable VOC emission limitation above shall be determined by multiplying the maximum batch capacity of this emissions unit (600 gallons), the maximum VOC content of all materials processed in the sandmill (6.53 lbs VOC/gal) and the facility determined mass balance loss factor of 1.1% of VOC loss/lbs of VOC in product (0.011), divided by the number of hours in a batch.

b. Emission Limitation

VOC emissions from emissions units P019, P020 and P021, combined, shall not exceed 1.26 tons per year (TPY) based upon a rolling, 12-month summation.

Applicable Compliance Method

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping specified in d)(2).

c. Emission Limitation

The maximum material throughput limit for emissions units P019, P020 and P021, combined, shall not exceed 35,000 gallons per year based upon a rolling, 12-month summation.

Applicable Compliance Method

Compliance with the annual material throughput restriction shall be based upon the record keeping specified in d)(2).

d. Emission Limitation

The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P019, P020 P021, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method

Compliance annual allowable HAPs emissions limitations above shall be based upon the record keeping specified in d)(3).

g) Miscellaneous Requirements

(1) None.