



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

3/9/2011

Certified Mail

Terri Snyder  
Decorative Paint Incorporated  
700 Randolph Street  
Montpelier, OH 43543

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0386000027  
Permit Number: P0107116  
Permit Type: Initial Installation  
County: Williams

|     |                                    |
|-----|------------------------------------|
| 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 Josh Mandel," 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, Northwest 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-NWDO; Michigan; Indiana





Response to Comments

Response to comments for: Permit-To-Install

Table with 2 columns and 7 rows containing facility information: Facility ID, Facility Name, Facility Description, Facility Address, Permit #, and hearing dates.

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health.

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

No comments Received.





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Decorative Paint Incorporated**

|                |                      |
|----------------|----------------------|
| Facility ID:   | 0386000027           |
| Permit Number: | P0107116             |
| Permit Type:   | Initial Installation |
| Issued:        | 3/9/2011             |
| Effective:     | 3/9/2011             |





Division of Air Pollution Control
Permit-to-Install
for
Decorative Paint Incorporated

Table of Contents

Authorization ..... 1
A. Standard Terms and Conditions ..... 3
1. Federally Enforceable Standard Terms and Conditions ..... 4
2. Severability Clause ..... 4
3. General Requirements ..... 4
4. Monitoring and Related Record Keeping and Reporting Requirements ..... 5
5. Scheduled Maintenance/Malfunction Reporting ..... 6
6. Compliance Requirements ..... 6
7. Best Available Technology ..... 7
8. Air Pollution Nuisance ..... 7
9. Reporting Requirements ..... 7
10. Applicability ..... 8
11. Construction of New Sources(s) and Authorization to Install ..... 8
12. Permit-To-Operate Application ..... 9
13. Construction Compliance Certification ..... 9
14. Public Disclosure ..... 9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations ..... 9
16. Fees ..... 10
17. Permit Transfers ..... 10
18. Risk Management Plans ..... 10
19. Title IV Provisions ..... 10
B. Facility-Wide Terms and Conditions ..... 11
C. Emissions Unit Terms and Conditions ..... 13
1. K046, UV basecoat coating line with UV/infrared oven ..... 14





## Authorization

Facility ID: 0386000027  
Facility Description: Motor Vehicle Parts and Accessories  
Application Number(s): A0038168, A0040608, A0040674  
Permit Number: P0107116  
Permit Description: NanoChrome plastic parts coating line consisting of base coat and top coat operations and UV/infrared oven.  
Permit Type: Initial Installation  
Permit Fee: \$400.00  
Issue Date: 3/9/2011  
Effective Date: 3/9/2011

This document constitutes issuance to:

Decorative Paint Incorporated  
700 Randolph Street  
Montpelier, OH 43543

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

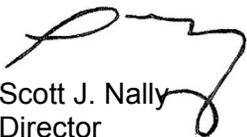
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

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

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0107116  
Permit Description: NanoChrome plastic parts coating line consisting of base coat and top coat operations and UV/infrared oven.

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>K046</b>                                    |
| Company Equipment ID:             | UV basecoat coating line with UV/infrared oven |
| 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, Northwest 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, Northwest 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, Northwest 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, Northwest 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, Northwest 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, Northwest 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, Northwest 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) Emissions unit K046, contained in this permit is subject to 40 CFR, Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA, Northwest District Office.

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



**1. K046, UV basecoat coating line with UV/infrared oven**

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

NanoChrome plastic parts coating line consisting of base coat and top coat operations and UV/infrared oven.

- 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)     | 2.84 lbs volatile organic compounds (VOC)/hr and 12.44 tons VOC/yr, from basecoat operations<br><br>2.66 lbs VOC/hr & 11.65 tons VOC/yr, from topcoat operations<br><br>4020 lbs organic compounds (OC)/month, from basecoat and topcoat cleanup operations<br><br>32.71 tons OC/yr, from cleanup operations from emissions units K028 through K032, K001, K034, K039, K040, K041, K043, K044, and K046, combined<br><br>See b)(2)a., b)(2)j., and c)(2) |
| b. | OAC rule 3745-31-05(D)        | 240 tons VOC/rolling, 12-month period, from coating operations, for emission units K001, K028 through K032, K034, K039, K040, K041, K043, K044, and K046, combined<br><br>See b)(2)b. and c)(1)  |
| c. | OAC rule 3745-21-07 (G)(2)    | See c)(3) and b)(2)c.  |
| d. | OAC rule 3745-17-11 (B)       | See b)(2)d. and b)(2)e.  |
| e. | OAC rule 3745-17-11 (C)       | See b)(2)f., b)(2)g., c)(4), c)(5), d)(6) through d)(10), and e)(3)c.  |

|    | Applicable Rules/Requirements                           | Applicable Emissions Limitations/Control Measures  |
|----|---|--|
| f. | OAC rule 3745-17-07 (A)                                 | See b)(2)d. and b)(2)h.  |
| g. | 40 CFR, Part 63, Subpart PPPP [63.4480 through 63.4581] | For each existing general use coating affected source, 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period from each emissions unit<br><br>See b)(2)i., d)(11), e)(4), f)(1)f., and f)(2) |
| h. | 40 CFR, Part 63.1 – 15 (40 CFR 63.4501)                 | Table 2 of Subpart PPPP of 40 CFR Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1-15 apply.   |

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11 (C) OAC rule 3745-21-07(G)(2), and OAC rule 3745-31-05(D), and 40 CFR, Part 63, Subpart PPPP.
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Prevention of Significant Deterioration (PSD) regulations:
 

240 tons VOC per rolling, 12-month period based on material usage restrictions for emission units K001, K028 through K032, K034, K039 K040, K041, K043, K044, and K046 combined [See c)(1)].

Federally enforceable VOC limitations were established in PTI #03-17378 issued June 23, 2008, and as such the facility has existing usage and VOC emissions records for the coating operations in lieu of establishing monthly restrictions for the first year of operation.
- 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:
 

c)(3), d)(2), and e)(2)
- d. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.

- e. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).
- f. The permittee shall operate the dry filtration control system whenever this emissions unit is in operation.
- g. 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.
- h. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- i. The permittee has elected to use either the compliance option provided by 40 CFR 63.4491(a) [compliant material option] or 40 CFR 63.4491(b) [emission rate without add-on controls option]. This is accomplished by demonstrating that the organic HAP emissions rate for the coating operation is less than or equal to the applicable emission limit in 63.4490, calculated as a rolling, 12-month emissions rate and determined on a monthly basis. The permittee must meet all of the requirements of 63.4540, 63.4541 and 63.4542 for the compliant material option, if this option is chosen, or 63.4550, 63.4551, and 63.4552 for the emission rate without add-on controls option, if this option is chosen, to demonstrate compliance with the emissions limit. The permittee is required to notify the Ohio EPA, Northwest District Office prior to the use of another compliance option as identified in 40 CFR 63.4491.
- j. The hourly and ton per year VOC emission limitations represent the potentials to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

c) **Operational Restrictions**

- (1) The maximum rolling, 12-month quantity of coating employed in emissions units K001, K028 through K032, K034, K039, K040, K041, K043, K044, and K046, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1} [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 240$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = VOC content in pounds per gallon of each coating employed

$G_i$  = Gallons used of each coating for the rolling 12-month period

$n$  = total number of unique coatings employed in emission units K001, K028 through K032, K034, K039, K040, K041, K043, K044, and K046

Compliance with the annual restriction on the amount of coatings shall be based upon a rolling, 12-month summation.

- (2) The use of volatile organic compounds, as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.
  - (3) The permittee shall not employ any liquid organic material that is a photochemically reactive material in this emissions unit as defined in OAC rule 3745-21-01 (C).
  - (4) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.
  - (5) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records that document whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).
  - (2) The permittee shall maintain monthly records that document whether or not each coating/cleanup material employed in this emissions unit is a photochemically reactive material as defined in OAC rule 3745-21-01 (C).
  - (3) The permittee shall maintain monthly records of the following information for emissions units K001, K028 through K032, K034, K039, K040, K041, K043, K044, and K046, combined:
    - a. the company name and identification for each coating employed;
    - b. the volume, in gallons, of each coating employed;
    - c. the VOC content of each coating employed, in pounds per gallon, as applied;
    - d. the VOC emission rate, in pounds, for each coating employed  $[d)(3)b. \times d)(3)c.]$ ;
    - e. the total VOC emission rate from all coatings employed  $[\text{summation of } d)(3)d.]$ , in pounds or tons;
    - f. the rolling, 12-month VOC emission rates, in tons.

- (4) The permittee shall maintain monthly records of the following information for cleanup materials employed in this emissions unit:
- a. the company name and identification for each cleanup material employed;
  - b. the volume, in gallons, of each cleanup material employed;
  - c. the OC content of each cleanup material employed, in pounds per gallon;
  - d. the OC emission rate, in pounds, for each cleanup material employed [d)(4)b. x d)(4)c.]; and
  - e. the total OC emissions rate from all cleanup materials employed [summation of d)(4)d.], in pounds or tons.

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.

- (5) In conjunction with the monitoring and record keeping in d)(4) above, the permittee shall collect and record the following information each month for all cleanup materials employed in emissions units K001, K028 through K032, K034, K039, K040, K041, K043, K044, and K046, combined:
- a. the volume, in gallons, of each cleanup material employed;
  - b. the OC content of each cleanup material employed, in pounds per gallon;
  - c. the OC emission rate, in pounds, for each cleanup material employed [d)(5)a. x d)(5)b.];
  - d. the total OC emissions rate from all cleanup materials employed [summation of d)(5)c.], in pounds or tons; and
  - e. the annual year-to-date OC emissions from all cleanup materials employed [sum of d)(5)d. for each calendar month to date from January to December].

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off site for disposal or reclamation [minus solids content of said material]) x solvent density.

- (6) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry filtration control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (7) The permittee shall conduct periodic inspections of the dry filtration control system 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.
- (8) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry filtration control system 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.
- (9) The permittee shall document each inspection (periodic and annual) of the dry filtration control system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

- (10) The permittee shall maintain records that document any time periods when the dry filtration control system was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry filtration control system 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.
  - (11) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart P, including the following sections:

63.4480 through 63.4581
- e) Reporting Requirements
- (1) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01

and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the event occurs.

- (2) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use any liquid organic material that is a photochemically reactive material in this emissions unit as defined in OAC rule 3745-21-01 (C). The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the event occurs.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the 240 tons of VOC per rolling, 12-month period for emissions units K001, K028 through K032, K034, K039, K040, K041, K043, K044, and K046 combined;
  - b. any exceedance of the monthly or annual cleanup material emissions limitations specified in Section b)(1)a. of this permit; and
  - c. any daily record showing that the dry filtration control 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.

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

- (4) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart P, including the following sections:
    - a. 63.4480 through 63.4581
- f) Testing Requirements
- (1) Compliance with the emission limitations specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation: 2.84 lbs VOC/hr and 12.44 tons VOC/yr from basecoat operations  
  
Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 1.0 gallon per hour and a maximum VOC content of 2.84 lbs/gallon.

The ton per year emission limitation was developed by multiplying the emission limitation of 2.84 lbs VOC/hr by a maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

- b. Emission Limitation: 2.66 lbs VOC/hr and 11.65 tons VOC/yr from topcoat operations

Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 1.0 gallon per hour and a maximum VOC content of 2.66 lbs/gallon.

The ton per year emission limitation was developed by multiplying the emission limitation of 2.66 lbs VOC/hr by a maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

- c. Emission Limitation: 240 tons VOC/rolling, 12-month period from coating operations for emissions units K001, K028 through K032, K034, K039, K040, K041, K043, K044, and K046 combined.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section d)(3) of this permit.

- d. Emission Limitation: 4020 lbs OC/month from cleanup operations

Applicable Compliance Method: Compliance shall be based on the recordkeeping in section d)(4) of this permit.

- e. Emission Limitation: 32.71 tons OC/yr from cleanup operations for emissions units K001, K028 through K032, K034, K039, K040, K041, K043, K044, and K046 combined

Applicable Compliance Method: Compliance shall be based on the recordkeeping in section d)(5) of this permit.

- f. Emission Limitation: For each existing general use coating affected source, limit organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period from each emissions unit

Applicable Compliance Method: The permittee shall demonstrate compliance with this limitation based upon the record keeping requirements specified in section d)(11) and the compliance requirements and test requirements specified in section f)(2) of the terms and conditions of this permit.

- (2) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart PPPP, including the following sections:

63.4480 through 63.4581

- g) Miscellaneous Requirements

- (1) None.