Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

3/22/2011

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)

Rich Krehnovi
Pittsburgh Glass Works, LLC
5066 Lincoln Highway
Crestline, OH 44827

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0370000217
Permit Number: P0106898
Permit Type: Initial Installation
County: Richland

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at 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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-NWDO

Response to Comments

Response to comments for: Permit-To-Install and Operate

Facility ID:	0370000217
Facility Name:	Pittsburgh Glass Works, LLC
Facility Description:	Products of Purchased Glass
Facility Address:	5066 Lincoln Highway Crestline, OH 44827 Richland County
Permit #:	P0106898, Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Mansfield News-Journal on 02/20/2011. The comment period ended on 03/22/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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

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

1. Topic: **No comments received**
    a. Comment: **None**
    b. Response: **None**

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Pittsburgh Glass Works, LLC

Facility ID:	0370000217
Permit Number:	P0106898
Permit Type:	Initial Installation
Issued:	3/22/2011
Effective:	3/22/2011
Expiration:	1/6/2014

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Pittsburgh Glass Works, LLC

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

1. What does this permit-to-install and operate ("PTIO") allow me to do? 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them? 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
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? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator? 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7

B. Facility-Wide Terms and Conditions 8

C. Emissions Unit Terms and Conditions 10

1. Emissions Unit Group - Window Assembly Lines: P044, P045, P046, P047, ... 11

Authorization

Facility ID: 0370000217
Application Number(s): A0040183
Permit Number: P0106898
Permit Description: Installation of 4 new window assembly lines
Permit Type: Initial Installation
Permit Fee: $800.00
Issue Date: 3/22/2011
Effective Date: 3/22/2011
Expiration Date: 1/6/2014
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Pittsburgh Glass Works, LLC
5066 Lincoln Highway
Crestline, OH 44827

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:

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

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

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0106898
Permit Description: Installation of 4 new window assembly lines

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

Group Name: Window Assembly Lines

Emissions Unit ID:	**P044**
Company Equipment ID:	P044
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P045**
Company Equipment ID:	P045
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P046**
Company Equipment ID:	P046
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P047**
Company Equipment ID:	P047
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

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 Ohio EPA DAPC, Northwest District Office 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 submitting[1] 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.

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.

[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).

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.

B. Facility-Wide Terms and Conditions

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.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Window Assembly Lines: P044, P045, P046, P047,

EU ID	Operations, Property and/or Equipment Description
P044	Window Assembly Line #16
P045	Window Assembly Line #17
P046	Window Assembly Line #18
P047	Window Assembly Line #19

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. b)(1)b., and g)(1).

(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)d., b)(2)e., b)(2)f., b)(2)g., c)(1), d)(2)a, d)(2)b, d)(2)d., d)(2)f., d)(2)h., d)(2)j., d)(3), d)(4), d)(5), e)(1) and f(1)b. – f)(1)e.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	7.30 tons organic compounds (OC)/yr, from the coating and adhesive operations See b)(2)a.
b.	OAC rule 3745-31-05(A), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 lbs/hr and 40 lbs/day [See b)(2)c. and b)(2)d.]
d.	OAC rule 3745-31-05(D)	Volatile organic compounds (VOC) emissions shall not exceed 40 lbs/day. [See b)(2)e.] 93.86 tons VOC per rolling, 12-month period for emissions units K004, P017 and P019-P047, combined [See b)(2)f.]

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		9.90 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP*) and 24.90 tons per rolling, 12-month period for any combination of HAPs for emissions units K004, P017 and P019-P047, combined [See b)(2)g.]
e.	ORC 3704.03(F) and OAC rule 3745-114-01	See g)(1)

(2) Additional Terms and Conditions

a. The following requirements contained in this permit satisfy Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001:

i. annual emission limitation of 7.30 tons OC/year for coating and adhesive operations. [Emissions from cleanup operations for an individual window assembly line are negligible and; therefore, have not been addressed by an individual emission limitation for each window assembly line. Emissions from cleanup operations are included in the combined VOC limitation established under OAC rule 3745-31-05(D)];

ii. compliance with the requirements of OAC rule 3745-21-07(G)(2); and

iii. compliance with the requirements established under OAC rule 3745-31-05(D).

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B 265 changes), such that BAT is no longer required by state regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

It should be noted that the emission limitations established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective December 1, 2006, do not apply to the VOC emissions from emissions units P044, P045, P046 and P047 since the calculated annual emission rate for VOC is less than ten tons per year for each emissions unit

taking into account the federally enforceable limitation of 40 lbs VOC/day established under OAC rule 3745-31-05(D) and the uncontrolled potential to emit for associated cleanup operations.

c. The 8 lbs/hr and 40 lbs/day OC limitations apply to emissions associated with the application of primer and adhesive materials. Emissions associated with cleanup operations do not apply to the 8 lbs/hr and 40 lbs/day OC limitations [See c)(2)].

d. 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)(2)d., c)(2), d)(1), d(2)c., d(2)e., d)(2)g., d(2)j., and f)(1)a.]

e. The emissions of VOC from an individual window assembly line shall not exceed 40 pounds per day. The VOC limitation is a federally enforceable limitation included in this permit for purposes of establishing the potential to emit for an individual window assembly line.

f. The emissions of VOC from emissions units K004, P017 and P019-P047, combined, shall not exceed 93.86 tons per year based on a rolling, 12-month summation of monthly emissions. The federally enforceable VOC limitation is based on coating usage restrictions and VOC content requirements [see c)(1) and c)(2)]. Federally enforceable VOC limitations are being established for purposes of avoiding Title V applicability.

Rolling emissions limitations have been established in Permit to Install (PTI) #03-13402 issued on February 27, 2001 and, as such, rolling, VOC emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

g. HAP* emissions from emissions units K004 P017 and P019-P047, combined, shall not exceed 9.90 tons per year for any individual HAP and 24.90 tons per year for any combination of HAPs, based upon rolling, 12-month summation of the monthly HAP emissions

Rolling emissions limitations have been established in Permit to Install (PTI) #03-13402 issued on February 27, 2001 and, as such, rolling HAP emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

c) Operational Restrictions

(1) The maximum annual coatings usage for emissions units K004, P017 and P019-P047, combined, shall not exceed any of the following:

a. 3,050 gallons of coatings, adhesives, and cleanup materials with a maximum VOC content of 11.0 lbs/gallon per rolling, 12-month period;

b. 25,067 gallons of coatings, adhesives, and cleanup materials with a maximum VOC content of 7.0 lbs/gallon per rolling, 12-month period; and

c. 25,067 gallons for all coatings, adhesives, and cleanup materials combined per rolling, 12-month period.

Coating usage restrictions were initially established in PTI #03-13402, issued on February 27, 2001, and as such, rolling coatings usage records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

(2) The use of any photochemically reactive cleanup material, as defined in OAC rule 3745-21-01, is prohibited in emissions units P044, P045, P046 and P047.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the cleanup materials employed in emissions units P044, P045, P046 and P047:

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

b. documentation on whether or not each cleanup material is a photochemically reactive material.

[the definition of “photochemically reactive” is based upon OAC rule 3745-21-01 (C)(5).]

(2) The permittee shall collect and record the following information for each day for each emissions unit (P044, P045, P046 and P047) separately:

a. the company identification for each coating and adhesive employed;

b. the number of gallons of each coating and adhesive employed;

c. the organic compound content of each coating and adhesive, in pounds per gallon;

d. the volatile organic compound content of each coating and adhesive, in pounds per gallon;

e. the organic compound emission rate from each coating and adhesive, in pounds per day [d)(2)b. times d)(2)c.];

f. the volatile organic compound emission rate from each coating and adhesive, in pounds per day [d)(2)b times d)(2)d.];

g. the total organic compound emission rate for all coatings and adhesives, in pounds per day [summation of d)(2)e.];

h. the total volatile organic compound emission rate for all coatings and adhesives, in pounds per day [summation of d)(2)f.];

i. the total number of hours the emissions unit was in operation;

j. the average hourly organic compound emission rate for all coatings and adhesives, d)(2)g. divided by d)(2)i., in pounds per hour (average); and

k. the average hourly volatile organic compound emission rate for all coatings and adhesives, d)(2)h. divided by d)(2)i., in pounds per hour (average)

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

(3) In order to demonstrate compliance with the 93.86 tons VOC per rolling, 12-month period, the permittee shall collect and record the following information each month for emissions units K004, P017 and P019-P047, combined:

a. the name and identification number of each coating, adhesive and cleanup materials;

b. the VOC content of each coating, adhesive, and cleanup material, in pounds per gallon, as applied;

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

d. the VOC emission rates from each coating, adhesive, and cleanup material employed [d)(3)b. x d)(3)c.], in pounds;

e. the total VOC emission rate from all the coatings, adhesives, and cleanup materials employed [summation of d)(3)d.]; and

f. the total annual emissions of VOC, in tons, based on a rolling, 12-month summation.

(4) The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K004, P017 and P019-P047, combined:

a. the company identification of each coating, adhesive, and cleanup material employed;

b. the pounds per gallon of each HAP in each coating, adhesive, and cleanup material, as applied;

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

d. the total emission rate for each HAP from all coatings, adhesives, and cleanup materials employed, [summation of each HAP emission rate [d)(4)b. x d)(4)c.] for each individual coating, adhesive, and cleanup material], in pounds per month;

e. the total HAP emission rate for the combination of all HAPs from all coatings, adhesives, and cleanup materials employed, [summation of d)(4)d. for all HAPs], in pounds per month; and

f. the annual emissions of each HAP and the combination of all HAPs, in tons, based upon rolling, 12-month summations.

(5) In addition to the above information, the permittee shall also collect and record the following information for each month for emissions units K004, P017 and P019-P047, combined:

a. the annual* number of gallons of each coating, adhesive, and cleanup material;

b. the annual* number of gallons of coatings, adhesives and cleanup materials with a maximum VOC content of 7.0 lbs/gallon;

c. the annual* number of gallons of coatings, adhesives, and cleanup materials with a maximum VOC content of 11.0 lbs/gallon of coating;

d. the annual* number of gallons of all coatings, adhesives, and cleanup materials.

*Based upon a rolling, 12- month summation of the monthly coatings, adhesive and cleanup material usage rates

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 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. 93.86 tons VOC per rolling, 12-month period for emission units K004, P017 and P019- P047, combined.

ii. 3,050 gallons of coating, adhesive, and cleanup material with a maximum VOC content of 11.0 pounds per gallon per rolling, 12-month period for emissions units K004, P017 and P019- P047, combined.

iii. 25,067 gallons of coating, adhesive, and cleanup material with a maximum VOC content of 7.0 pounds per gallon per rolling, 12-month period for emission units K004, P017 and P019- P047, combined.

iv. 25,067 gallons of coating, adhesive, and cleanup material per rolling, 12-month period for emission units K004, P017 and P019- P047, combined.

v. 9.90 tons per rolling 12-month period of any individual HAP for emissions units K004, P017 and P019- P047, combined.

vi. 24.90 tons per rolling 12-month period of any combination of HAPs for emissions units K004, P017 and P019- P047, combined.

vii. 40 lbs VOC per day from coating and adhesive operations.

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 (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (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 emissions limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u>

Emissions of OC shall not exceed 8 pounds per hour and 40 pounds per day

<u>Applicable Compliance Method:</u>

Compliance shall be demonstrated through the record keeping requirements specified in d)(2).

b. VOC emissions shall not exceed 40 lbs/day

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in d)(2).

c. Emission Limitation:

93.86 tons VOC per rolling, 12-month period for emissions units K004, P017 and P019- P047. combined.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in d)(3).

d. Emission Limitations:

The maximum annual coatings usage for emissions units K004, P017 and P019-P047, combined, shall not exceed any of the following:

i. 3,050 gallons of coating, adhesive, and cleanup material with a maximum VOC content of 11.0 lbs/gallon per rolling, 12-month period;

ii. 25,067 gallons of coating, adhesive, and cleanup material with a maximum VOC content of 7.0 lbs/gallon per rolling, 12-month period; and

iii. 25,067 gallons for all coatings, adhesives, and cleanup materials combined per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in d)(5).

e. Emission Limitation:

9.90 tons per rolling, 12-month period of any individual HAP for emission units K004, P017 and P019- P047, combined.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in d)(4).

f. Emission Limitation:

24.90 tons per rolling 12-month period of any combination of HAPs for emission units K004, P017 and P019- P047, combined.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in d)(4).

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the maximum annual emissions for each toxic air contaminant (from emission units P044, P045, P046 and P047 combined), 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 permit to install 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 above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.