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

8/5/2011

Certified Mail

Facility ID: 1667060088
Permit Number: P0102184
County: Portage

Mr. Richard Olechnowicz
Duracote Corp.
350 North Diamond Street
P.O. Box 1209
Ravenna, OH 44266-1209

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it 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 Title V permit 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 Akron Regional Air Quality Management District. 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.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Akron Regional Air Quality Management District

Ohio | Environmental Protection Agency

# FINAL

# Division of Air Pollution Control
# Title V Permit
for
Duracote Corp.

| | |
|---|---|
| Facility ID: | 1667060088 |
| Permit Number: | P0102184 |
| Permit Type: | Renewal |
| Issued: | 8/5/2011 |
| Effective: | 8/26/2011 |
| Expiration: | 8/26/2016 |

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Title V Permit**
for
Duracote Corp.

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# Authorization

Facility ID: 1667060088
Facility Description: Coated Fabrics, Not Rubberized.
Application Number(s):A0034017, A0034018
Permit Number: P0102184
Permit Description: Renewal Title V permit for manufacturer of coated and laminated vinyl and fabric substrate products.
Permit Type: Renewal
Issue Date: 8/5/2011
Effective Date: 8/26/2011
Expiration Date: 8/26/2016
Superseded Permit Number: P0102183

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

Duracote Corp.
350 North Diamond Street
P.O. Box 1209
Ravenna, OH 44266-1209

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

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Akron Regional Air Quality Management District. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

# A. Standard Terms and Conditions

## 1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

*(Authority for term: ORC 3704.036(A))*

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

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or

local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed

adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Akron Regional Air Quality Management District.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**3. Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**4. Risk Management Plans**

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

**5. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

**6. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**7. General Requirements**

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**8. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

## 11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

## 12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*

## 13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

**14. Permit Shield**

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

**15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

**16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

**17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

**18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

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

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

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

**21. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only**

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**25. Records Retention Requirements Under State Law Only**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**26. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

**27. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air

pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

*(Authority for term: OAC rule 3745-77-01(C))*

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

# B. Facility-Wide Terms and Conditions

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

   a) None.

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

   B002 Cleaver Brooks boiler
   B003 Cleaver Brooks boiler
   B004 Columbia boiler
   K005 laminator #1
   Z001 gas oven (K001)
   Z002 gas oven (K002A)
   Z003 gas oven (K002B)
   Z004 gas oven (K002C)
   Z005 gas oven (K003)
   Z006 gas oven (K004)
   Z007 gas oven (K005)
   Z008 storage tank #1
   Z009 storage tank #2
   Z010 storage tank #3
   Z011 storage tank #4

   Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

   (Authority for term: OAC rule 3745-77-07(A)(13)

# C. Emissions Unit Terms and Conditions

## 1. Emissions Unit Group - Coating Lines: K001, K002, K003, K004, K006,

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| K001 | Vinyl Coating Line-one oven-one head coater for coating fabrics w/plastisols, organisols, solutions and water-based coatings; no add-on emissions control employed. |
| K002 | Vinyl Coating Line, three ovens with coating head for coating plastisols, organisols, and various coatings of polymer type; no add-on emissions control employed. |
| K003 | Fabric Coating Line - one or two dip tanks with oven; no add-on emissions control employed. |
| K004 | Fabric Coating Line - Lamination of Aluminum foil to fabrics with oven; no add-on emissions control employed. |
| K006 | For laminating various films on other substrates - 100% solids; no add-on emissions control employed. |

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) (established in P0107410, applicable to emissions unit K006) | The volatile organic compound (VOC) content of the coatings employed shall not exceed a daily volume-weighted average of 2.90 pounds per gallon, as applied, excluding water and exempt solvents.<br><br>VOC emissions shall not exceed 29.0 pounds per hour, as a daily average from coatings. [The hourly VOC emission limit is based upon a maximum VOC content of 2.90 pounds per gallon of coating and a maximum coating application rate of 10 gallons per hour.]<br><br>The requirements established pursuant to this rule also include the requirements of OAC rule 3745-31-05(D), 40 CFR Part 63,Subpart A and 40 CFR Part 63, Subpart OOOO. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| b. | OAC rule 3745-31-05(D) (established in P0107410 to avoid Major New Source Review) | VOC emissions (from coatings and cleanup materials) from this facility (emissions units K001, K002, K003, K004 and K006, combined) shall not exceed 249 tons per year, as a rolling, 12-month summation of the monthly emission rates.<br><br>This facility (emissions units K001, K002, K003, K004 and K006, combined) 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 monthly VOC emission rates, upon final issuance of this permit. See c)(2) and d)(2). |
| c. | OAC rule 3745-21-09(G)<br>OAC rule 3745-21-09(H)(1)(a)<br>(applicable to emissions unit K006) | The VOC emission limitations required by these rules are less stringent than the VOC emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| d. | OAC rule 3745-21-09(G)<br>(applicable to emissions units K003 and K004) | Except as otherwise provided in paragraph (B)(6) of this rule, no owner or operatorof a fabric coating line may cause, allow or permit the discharge into the ambientair of any VOCs after the date specified in paragraph (C)(6) of rule 3745-21-04 ofthe Administrative Code in excess of 2.9 pounds of VOC per gallon of coating,excluding water and exempt solvents. |
| e. | OAC rule 3745-21-09(H)(1)(a)<br>(applicable to emissions units K001 and K002) | The VOC content of the coatings employed in the vinyl coating line, as determined under paragraph (B) of rule 3745-21-10 of the Administrative Code, shall not exceed 4.8 pounds of VOC per gallon of vinyl coating, excluding water andexempt solvents. |
| f. | 40 CFR Part 63, Subpart OOOO | Per §63.4283(c), the owner/operator of an existing affected source must achieve compliance with the applicable provisions of this subpart no later than 3 years after May 29, 2003.<br><br>Per §63.4291(a)(2) *Emission rate without add-on controls option* and Table 1. #2 to Subpart OOOO of Part 63, the permittee of this existing affected coating operation shall limit organic HAP emissions to the atmosphere to no more than 0.12 kg of |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | organic HAP per kg of solids applied, calculated as a rolling 12-month average emission rate.<br><br>See b(2)b. and b(2)c.; d(4) and d(5); e(4) and e(5); and f(1)d. |
| g. | 40 CFR Part 63,Subpart A | Per §63.4301,Table 3 to 40 CFR Part 63 Subpart OOOOshows which parts of the General Provisions in §§63.1 through 63.15 are applicable to Subpart OOOO. The complete 40 CFR Part 63 requirements, including the General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR)website http://ecfr.gpoaccess.gov. |

(2) Additional Terms and Conditions

a. The permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final Permit-to-Install (PTI) prior to making any change to VOC contents of coatings applied, production capacity, cleanup materials, etc., or any change(s) to the method of operation, or any other change to this emissions unit that results in an increase in the allowable emissions or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 of any type of air contaminant not previously emitted.

b. Per §63.4300(a)(2), the permittee must be in compliance with the applicable organic HAP emissions limit specified in §63.4291(a)(2) *Emission rate without add-on controls option* and Table 1. #2 to Subpart OOOO of Part 63 for all compliance periods.

c. Per §63.4300(b), the permittee must always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).

c) Operational Restrictions

(1) Prior to the use of any coating in this coating line, the permittee shall determine that the coating meets the toxic screening criteria described below.

Purpose: The purpose of this test is to evaluate coatings to determine if the chemical compounds in the coatings would be emitted at acceptable levels for the general permit.

Data Needed: (1) MSDS sheet for each coating to be evaluated. (2) information on the maximum coating usage rate for the line as discussed in Step 1 below.

Step 1. Using the following factors, calculate the maximum coating usage rate in terms of gallons per hour:

a. Assume the coating line operates at its maximum speed while still making usable product.

b. Assume the coating line is operating at its largest coating laydown rate. This would typically be accomplished by assuming the coating line is painting the largest part available.

Step 2. Review the material safety data sheet (MSDS) for the coating. Note each chemical compound listed, its TLV and the percent by weight of the chemical compound in the coating.

Step 3. Determine if any of the chemical compounds listed in the MSDS are also listed in the following table. If any of the chemical compounds are listed in the table, then calculate the maximum annual emission of that compound by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. Then multiply the result by 8760 hours per year. The result will be in pounds per year.

Check to see if the calculated emission rate is less than the allowable emission rate found in the below table. If all of the compounds emitted have a maximum annual emission of less than the allowed rate, then move on to step 4. If any of the compounds are emitted at a rate higher than the allowed emission rate, then contact yourappropriate District Office or local air agency contact to determine if you can use the coating.

| Chemical Compound | CAS | Molecular Weight (MW) | Allowed Emission Rate (lb/year) |
|---|---|---|---|
| arsenic compounds, as As | 7440-38-2 | 74.92 | 1.70 |
| benzene | 71-43-2 | 78.11 | 1100 |
| benzidine | 92-87-5 | 184.23 | 5.60 |
| benzo(a)pyrene | 50-32-8 | 252.30 | 6.90 |
| beryllium (and Be compounds) | 7440-41-7 | 9.01 | 0.350 |
| Cadmium | 7440-43-9 | 112.4 | 5.20 |
| Chromium | 7440-47-3 | varies | 0.690 |
| Hexachlorobenzine (HCB) | 118-74-1 | 289.78 | 35.0 |
| mercury (and Hg compounds) | 7439-97-6 | 200.59 | 0.1 |
| nickel (Ni subsulfide) | 12035-72-2 | 240.19 | 17.0 |
| Polychlorinated dibenzo-p-dioxins | 1746-01-6 | varies | 0.030 |
| Polychlorinated dibenzofurans | 132-64-9 | varies | 0.030 |
| polychlorinated biphenyls (PCBs, aroclors) | 1336-36-3 | varies | 87.0 |
| vinyl chloride | 75-01-4 | 62.50 | 2000 |

Step 4. Find all of the chemical compounds in the coating that have a listed American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV). For each chemical compound with a listed TLV (other than those in the above table), calculate the maximum short-term emission rate by multiplying the maximum coating

usage rate times the percent by weight of each chemical compound. The result should be in terms of pounds of the chemical compound per hour.

Step 5. Determine if the compound will be emitted at or below the acceptable rate. This is done by searching the following table for the chemical compound's TLV and then determining the maximum allowed emission rate listed in the below table. (Note. If the TLV is listed as ppm, then convert the TLV to $\mu g/m^3$ by using the following formula: (TLV in ppm)x(MW)x(1000)/24.45 = TLV in $\mu g/m^3$; where MW is the molecular weight of the compound.) This table lists the allowable emission rates for compounds with a TLV between the high range and low range. Compare the maximum calculated short-term emission rate of each chemical compound to the allowed emission rate in the table. If the maximum emission rate is less than the allowed emission rate, then the chemical compound is emitted at an acceptable rate.

| TLV Range ($\mu g/m^3$) (The TLV must be less than the high value listed and greater than or equal to the low value listed) | | Allowed Emission Rate (lb/hr) |
|---|---|---|
| 15 | 1 | 0.000067 |
| 30 | 15 | 0.0010 |
| 60 | 30 | 0.0020 |
| 120 | 60 | 0.0040 |
| 240 | 120 | 0.0080 |
| 480 | 240 | 0.0160 |
| 960 | 480 | 0.0320 |
| 1,920 | 960 | 0.0640 |
| 3,840 | 1,920 | 0.128 |
| 7,680 | 3,840 | 0.256 |
| 15,360 | 7,680 | 0.512 |
| 30,720 | 15,360 | 1.02 |
| 61,440 | 30,720 | 2.05 |
| 122,880 | 61,440 | 4.10 |
| 245,760 | 122,880 | 8.19 |
| 491,520 | 245,760 | 16.4 |
| 983,040 | 491,520 | 32.8 |
| 1,966,080 | 983,040 | 65.5 |
| 3,932,160 | 1,966,080 | 131 |

Step 6. Check each chemical compound that has a listed TLV. If all compounds are emitted at a rate less than the allowed emission rate, then the coating passes the toxic screening test and can be used under this permit. If one or more of the chemical compounds are emitted at a rate greater than the allowed emission rate, then you should contact your appropriate District Office or local air agency contact to determine if you can use the coating.

(2) The maximum annual VOC material usage* (from coatings and cleanup materials) for this facility (emissions units K001, K002, K003, K004 and K006, combined) shall not exceed 249 tons, based upon a rolling, 12-month summation of the VOC material usage rates.

This facility (emissions units K001, K002, K003, K004 and K006, combined) 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 monthly VOC material usage rates, upon final issuance of this permit.

*Annual VOC material usage rate (input) is equivalent to an annual VOC emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for each coatingline:

a. The name and identification number of each coating employed.

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

c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.

d. The daily VOC emissions from all the coatings employed, in pounds, [i.e., the sum of d)(2)b. times d)(2)c. for each coating employed].

e. The daily volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

f. For emissions unit K006, the total number of hours this emissions unit was in operation.

g. For emissions unit K006, the average hourly VOC emissions from all coatings employed, in pounds [i.e.,the quotient of d)(1)d. divided by d)(1)f.].

Note: If the VOC content of each of the coatings employed during a day is less than 2.90 pounds per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

(Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(G), OAC rule 3745-21-09(H)(1)(a)and OAC rule 3745-77-07(C)(1))

(2) The permittee shall collect and record the following information each month for this facility (emissions units K001, K002, K003, K004 and K006, combined) to determine the total VOC material usage and emissions:

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

b. the weight, in pounds per month, of each coating, as applied;

c. the weight, in pounds per month, of each cleanup material, as applied;

d. the VOC content of each coating, as applied, in percent by weight;

e. the VOC content of each cleanup material, as applied, in percent by weight;

f. the total VOC material usage of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total VOC material usage of all cleanup materials, in pounds per month, i.e., g = sum[c x e] for all cleanup materials, excluding cleanup material recovered;

h. the total VOC material usage of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

i. the total VOC emissions from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

j. the rolling, 12-month total VOC material usage rates of all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month total VOC emissions rates from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

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

(3) The permittee shall collect and record the results of any toxic screening evaluations done per c)(1).

(4) The permittee shall comply with the following applicable record keeping requirements identified in40 CFR Part 63, Subpart OOOO:

| Applicable Rule | Requirement |
|---|---|
| §63.4312 | The permittee must collect and keep a record of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard. See d)(6). |
| §63.4313 | The permittee must maintain and keep required records according to §63.10(b)(1). |

(Authority for term: OAC rule 3745-31-05(A)(3), 40 CFR Part 63, Subpart OOOO and OAC rule 3745-77-07(C)(1))

(5) Per §63.4312, the permittee must collect and keep the following records for any web coating operation complying with the emission rate without add-on controls option:

a. A copy of each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report.

b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data or test data used to determine the mass fraction of organic HAP for coating, printing, slashing, dyeing, finishing, thinning, and cleaning materials; and the mass fraction of solids for coating and printing materials. If you conducted testing to determine mass fraction of organic HAP of coating materials or the mass fraction of solids of coating materials, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

c. A record of the web coating/printing operations on which you used each compliance option, i.e., theemission rate without add-on controls option, and the time periods (beginning and ending dates) you used each option. For each month, a record of all required calculations for the compliance option(s) you used, as specified below:

   i. For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coating, printing, thinning and cleaning materials applied each compliance period using Equations 1, 1A, and 1B of §63.4331 and, if applicable, the calculation used to determine the mass of organic HAP in waste materials according to §63.4331(a)(4)(iii); the calculation of the total mass of the solids contained in all coating and printing materials applied each compliance period using Equation 2 of §63.4331; and the calculation of the organic HAP emission rate for each compliance period using Equation 3 of §63.4331.

d. A record of the name and mass of each regulated material applied in the web coating and printing subcategory and the dyeing and finishing subcategory during each compliance period.

e. A record of the mass fraction of organic HAP for each regulated material applied during each compliance period.

f. A record of the mass fraction of coating and printing solids for each coating and printing material applied during each compliance period.

g. If you use an allowance in Equation 1 or 4 of §63.4331 for organic HAP contained in waste materials sent to, or designated for shipment to, a treatment, storage, and disposal facility (TSDF) according to §63.4331(a)(4)(iii) or (b)(3)(ii), you must keep records of the information, as specified below:

   i. The name and address of each TSDF to which you sent waste materials for which you used an allowance in Equation 1 or 4 of §63.4331, a

statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility, and the date of each shipment.

ii. Identification of the web coating/printing or dyeing/finishing operations producing waste materials included in each shipment and the compliance period(s) in which you used the allowance for these materials in Equation 1 or 4, respectively, of §63.4331.

iii. The methodology used in accordance with §63.4331(a)(3)(iii) or (b)(4)(ii) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each compliance period; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.

h. If you use an allowance in Equation 4 of §63.4331 for organic HAP contained in wastewater discharged to a POTW or treated onsite prior to discharge according to §63.4331(c), you must keep records of the information, as specified below:

i. Documentation that the wastewater was either discharged to a POTW or onsite secondary wastewater treatment.

ii. Calculation of the allowance, WW, using the fraction of organic HAP applied in affected processes that is discharged to the wastewater determined from the most recent performance test and the mass of organic HAP in the dyeing and finishing materials applied during the compliance period, A, calculated in Equation 4 of §63.4331.

i. You must keep records of the date, time, and duration of each deviation.

(Authority for term: OAC rule 3745-31-05(A)(3), 40 CFR Part 63, Subpart OOOO and OAC rule 3745-77-07(C)(1))

e) Reporting Requirements

(1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily volume-weighted average greater than 2.90 pounds VOC per gallon coating, as applied, excluding water and exempt solvents for each of emissions units K003, K004 and K006; and 4.8 pounds VOC per gallon coating, as applied, excluding water and exempt solvents for each of emissions units K001 and K002.Thenotification shall include a copy of such record and shall be sent to the Director(appropriate District Office or local air agency) within 30 days after the exceedanceoccurs.

(Authority for term: OAC rule 3745-31-05(A)(3), OAC rule 3745-21-09(G), OAC rule 3745-21-09(H)(1)(a) and OAC rule 3745-77-07(C)(1))

(2) The permittee shall submit quarterly reports that identify each day/month VOC emissions exceeded the following limits:

a. For emissions unit K006, VOC emissions shall not exceed 29.0 pounds per hour, as a daily average fromcoatings;

b. The maximum annual VOC material usage* (from coatings and cleanup materials) for this facility (emissions units K001, K002, K003, K004 and K006, combined) shall not exceed 249 tons, based upon a rolling, 12-month summation of the VOC material usage rates; and

c. VOC emissions (from coatings and cleanup materials) from this facility (emissions units K001, K002, K003, K004 and K006, combined) shall not exceed 249 tons per year, as a rolling, 12-month summation of the monthly emission rates.

The quarterly deviations reports shall be submitted to the Director (appropriate District Office or local air agency) in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

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

(3) The permittee shall submit annual compliance reports that include:

a. a list of all allowable emissions limits and operational restrictions in b)(1), c)(1) and c)(2); and

b. a statement whether the emissions unit is in compliance with the requirements listed.

The report shall be submitted to the Director (the appropriate District Office or local air agency) by February 1 of each year and shall cover the previous calendar year.

Annual Compliance Certification reports submitted according to the requirements of the Title V program are sufficient to meet this requirement.

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

(4) The permittee shall comply with the following applicable notification and reporting requirements identified in40 CFR Part 63, Subpart OOOO:

| Applicable Rule | Requirement |
|---|---|
| §63.4310 | The permittee must submit the *Initial Notification* and *Notification of Compliance Status* and all other applicable notifications by the dates and in accordance with the requirements specified in this section. |

| | |
|---|---|
| §63.4311 | The permittee must submit *Semiannual Compliance Reports*according to the specified schedule and applicable requirements of paragraphs (a)(1) through (8) of this section. See e)(5). |

(Authority for term: OAC rule 3745-31-05(A)(3), 40 CFR Part 63, Subpart OOOO and OAC rule 3745-77-07(C)(1))

(5) Per §63.4311, the permittee mustsubmit semiannual compliance reports for each affected source according to the requirements, as specified below:

a. *Dates.* Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must prepare and submit each semiannual compliance report according to the dates in§63.4311(a)(1)(i) through (iv), as specified below:

i. The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in §§63.4320, 63.4330, 63.4340, or 63.4350 that applies to your affected source and ends on June 30 or December 31, whichever date is the first date at least 6 months after the end of the initial compliance period.

ii. Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

iii. Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

iv. For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) of this section.

b. *Inclusion with title V report.* Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the

affected source may have to report deviations from permit requirements to the permitting authority.

c. *General requirements.* The semiannual compliance report must contain the information specified in paragraphs (a)(3)(i) through (v) of this section, and the information specified in paragraphs (a)(4) through (8) and (c)(1) of this section that is applicable to your affected source. If your affected source is a slashing operation(s), you are only required to report the information in paragraphs (a)(3)(i) through (iii) of this section and the information in paragraph (a)(4) or (a)(5) of this section, as applicable.

i. Company name and address.

ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

iii. Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31.

iv. Identification of the compliance option or options specified in §63.4291 that you used on each web coating/printing and dyeing/finishing operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates you used each option.

v. If you used the emission rate without add-on controls, the emission rate with add-on controls, or the organic HAP overall control efficiency compliance option for web coating/printing operations (§63.4291(a)(2), (3), or (4)), or the emission rate without add-on controls or the emission rate with add-on controls compliance option for dyeing/finishing operations (§63.4291(c)(2) or (c)(3)), the calculation results for each compliance period ending each month during the 6-month reporting period.

d. *No deviations.* If there were no deviations from the emission limitations in Table 1 to this subpart and §§63.4292, and 63.4293 that apply to you, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. If you use the emission rate with add-on controls option, the organic HAP overall control efficiency option, or the oxidizer outlet organic HAP concentration option and there were no periods during which the continuous parameter monitoring systems (CPMS) were out-of-control as specified in §63.8(c)(7), the semiannual compliance report must include a statement that there were no periods during which the CPMS were out-of-control during the reporting period.

e. *Deviations: emission rate without add-on controls option.* If you use the emission rate without add-on controls option and there was a deviation from the applicable emission limit in Table 1 to this subpart, the semiannual compliance report must contain the information in §63.4311(a)(6)(i) through (iii), as specified below:

i. The beginning and ending dates of each compliance period during which the organic HAP emission rate exceeded the applicable emission limit in Table 1 to this subpart.

ii. The calculations used to determine the organic HAP emission rate for the compliance period in which the deviation occurred. You must submit the calculations for Equations 1, 1A and 1B, 2, and 3 in §63.4331 for web coating/printing operations; and for Equations 4, 4A, 5, and 6 in §63.4331 for dyeing/finishing operations; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.4331(a)(4)(iii) or (b)(3)(ii); and, for dyeing/finishing operations, if applicable, the mass of organic HAP in wastewater streams calculation for Equation 7 in §63.4331. You do not need to submit background data supporting these calculations (*e.g.,* information provided by materials suppliers or manufacturers, or test reports).

iii. A statement of the cause of each deviation.

(Authority for term: OAC rule 3745-31-05(A)(3), 40 CFR Part 63, Subpart OOOO and OAC rule 3745-77-07(C)(1))

f) Testing Requirements

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

a. <u>Emissions Limitation</u>:

The volatile organic compound (VOC) content of the coatings employed shall not exceed a daily volume-weighted average of 2.90 pounds per gallon, as applied, excluding water and exempt solvents.

<u>Applicable Compliance Method</u>:

Compliance shall based upon the record keeping specified in d)(1).

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

b. <u>Emissions Limitation</u>:

VOC emissions shall not exceed 29.0 pounds per hour, as a daily average from coatings.

<u>Applicable Compliance Method</u>:

Compliance shall based upon the record keeping specified in d)(1).

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

c. Emissions Limitation:

VOC emissions (from coatings and cleanup materials) from this facility (emissions units K001, K002, K003, K004 and K006, combined) shall not exceed 249 tons per year, as a rolling, 12-month summation of the monthly emission rates.

Applicable Compliance Method:

Compliance shall based upon the record keeping specified in d)(2).

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

d. Emissions Limitation:

The permittee of this existing affected coating operation shall limit organic HAP emissions to the atmosphere to no more than 0.12 kg of organic HAP per kg of solids applied, calculated as a rolling 12-month average emission rate, for the emission rate without add-on controls option.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the dates, procedures, equations and other requirements, as specified in §§63.4330, 63.4331 and 63.4332 of 40 CFR Part 63, Subpart OOOO.

(Authority for term: OAC rule 3745-31-05(A)(3), 40 CFR Part 63, Subpart OOOO and OAC rule 3745-77-07(C)(1))

e. Emissions Limitation:

The VOC content of the coatings employed in the vinyl coating line shall not exceed 4.8 pounds of VOC per gallon of vinyl coating, excluding water andexempt solvents.

Applicable Compliance Method:

Compliance shall based upon the record keeping specified in d)(1).

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

f. Emissions Limitation:

The VOC content of the coatings employed in the fabric coating line shall not exceed 2.9 pounds of VOC per gallon of fabric coating, excluding water andexempt solvents.

Applicable Compliance Method:

Compliance shall based upon the record keeping specified in d)(1).

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

(2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

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

g) Miscellaneous Requirements

(1) None.