



Environmental
Protection Agency

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

8/22/2011

Mrs. ELIZABETH MILLER
MAUSER USA, LLC
25 COTTERS LANE
EAST BRUNSWICK, NJ 08816

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0125041529
Permit Number: P0082943
Permit Type: Renewal
County: Franklin

Certified Mail

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

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, Central District Office at (614)728-3778 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, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
MAUSER USA, LLC**

Facility ID:	0125041529
Permit Number:	P0082943
Permit Type:	Renewal
Issued:	8/22/2011
Effective:	8/22/2011
Expiration:	8/22/2016



Division of Air Pollution Control
Permit-to-Install and Operate
for
MAUSER USA, LLC

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Authorization

Facility ID: 0125041529
Application Number(s): A0013300
Permit Number: P0082943
Permit Description: Renewal FEPTIO for a boiler and coating line at a facility that coats the inside and outside of 55-gallon steel drums.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 8/22/2011
Effective Date: 8/22/2011
Expiration Date: 8/22/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

MAUSER USA, LLC
1410 BLATT BLVD
Gahanna, OH 43230

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

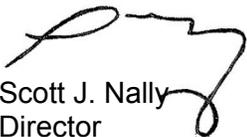
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0082943
Permit Description: Renewal FEPTIO for a boiler and coating line at a facility that coats the inside and outside of 55-gallon steel drums.

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

Emissions Unit ID: B001
Company Equipment ID: Air Makeup Heater
Superseded Permit Number: 01-6389
General Permit Category and Type: Not Applicable

Emissions Unit ID: P003
Company Equipment ID: Paint Room
Superseded Permit Number: 01-6389
General Permit Category and Type: Not Applicable

Group Name: Coating Process

Emissions Unit ID:	K001
Company Equipment ID:	Drum Lining Line
Superseded Permit Number:	01-06362
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Exterior Coating Line
Superseded Permit Number:	01-06362
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Lid and Bottom Coating Line
Superseded Permit Number:	01-06362
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, Central 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 submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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.

¹Permittees 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. B001, Air Makeup Heater

Operations, Property and/or Equipment Description:

10.0 MMBtu/hr natural gas indoor ambient air space heater

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

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

a. None.

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

a. 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 by PTI 01-6389, issued final January 21, 1998)	NO _x emissions shall not exceed 1.4 lbs/hr and 6.13 tpy. Carbon monoxide (CO) emissions shall not exceed 0.35 lb/hr and 1.53 tpy. Sulfur dioxide (SO ₂) emissions shall not exceed 0.01 lb/hr and 0.03 tpy. Particulate emissions (PE) shall not exceed 0.14 pound per hour (lb/hr) and 0.61 ton per year (tpy). Volatile organic compound (VOC) emissions shall not exceed 0.06 lb/hr and 0.25 tpy.
b.	OAC rule 3745-17-07(A)	See b)(2)a.
c.	OAC rule 3745-17-10(B)(1)	See b)(2)b.
d.	OAC rule 3745-17-11(B)(11)	See b)(2)c.
e.	OAC rule 3745-18-06	See b)(2)d.

- (2) Additional Terms and Conditions
- a. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11 or OAC rule 3745-17-10.
 - b. OAC rule 3745-17-10 applies to fuel burning equipment that produce heat by indirect heat transfer. The rule does not apply to this emissions unit since the products of combustion are directly transferred to the indoor air.
 - c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(4), is equal to zero.
 - d. This emissions unit is exempt from the emission limitations specified in OAC rule 3745-18-06, pursuant to OAC rule 3745-17-07(B), because the emissions unit is has a rated heat input equal to, or less than, 10 MM Btu per hour total rated capacity.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- e) Reporting Requirements
- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.
 - (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions shall not exceed:

NO_x – 1.4 lb/hr, 6.13 tpy

CO – 0.35 lb/hr, 1.53 tpy

SO₂ – 0.01lb/hr, 0.03tpy

PE – 0.14 lb/hr, 0.61 tpy

VOC – 0.06lb/hr, 0.25tpy

Applicable Compliance Method(s):

NO_xemissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,000 cu. Ft/hr) by an emissions factor for natural gas of 140 lbsNO_x/mmscf. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

COemissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,000 cu. Ft/hr) by an emissions factor for natural gas of 35 lbs CO/mmscf. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

SO₂ emissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,000 cu. Ft/hr) by an emissions factor for natural gas of 0.6 lb SO₂/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C.

PEemissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,000 cu. Ft/hr) by an emissions factor for natural gas of 1.9 lbs PE/mmscf. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 1-5.

Final Permit-to-Install and Operate

MAUSER USA, LLC

Permit Number: P0082943

Facility ID: 0125041529

Effective Date: 8/22/2011

VOC emissions may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,000 cu. Ft/hr) by an emissions factor for natural gas of 5.8 lbs VOC/mmscf. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760 hrs/yr, and dividing by 2000 lbs/ton)..

g) Miscellaneous Requirements

- (1) None.

2. P003, Paint Room

Operations, Property and/or Equipment Description:

Paint Mix and Pumping Room

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. 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 by PTI 01-6389, issued final January 21, 1998)	Volatile organic compound (VOC) emissions shall not exceed 1.98 pounds per hour (lbs/hr) 19.8 pounds per day (lbs/day), and 3.1 tons per year (tpy). See b)(2)a. – c.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT) (Established by PTI 01-06362, issued final 12/28/2006)	<p><u>For K001, K002, K003, and P003 combined:</u></p> VOC emissions from all coatings and cleanup/solvent materials employed in the emissions units K001, K002, K003, and P003 combined shall not exceed 88.0 tons per rolling, 12-month period. Individual HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 combined shall not

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 9.9 tons per rolling, 12-month period. Combined HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 combined shall not exceed 24.9 tons per rolling, 12-month period. See c)(2) – (3)
c.	OAC rule 3745-21-07(G)(2)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See b)(2)d.

(2) Additional Terms and Conditions

- a. The maximum annual gallons of coatings mixed in this emissions unit shall not exceed 51,721 gallons.
- b. The maximum daily operating hours for this emissions unit shall not exceed 10 hours.
- c. The maximum annual operating hours for this emissions unit shall not exceed 3,120 hours.
- 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 the emission unit.

c) Operational Restrictions

- (1) All drums containing paint shall be covered with lids to minimize the loss of VOC from the paint during mixing operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect the following information each day for the mixing operation:
 - a. the number of mixing units in operation during the day;

- b. the number of hours each individual mixing unit was in operation (a mixing unit is in operation if any mixing is being performed in the unit);
 - c. the total number of hours of operation for all mixing units; and
 - d. the total daily VOC emissions from all mixing units (total from c. times a company supplied emission factor of 0.22 lb VOC/hr of mixing operation, calculated by weighing drums before and after an hour of mixing was performed).
- (2) The permittee shall collect and record the following information each month for emissions unit **K001**, **K002**, and **K003**, and **P003**:
- a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, as applied;
 - c. the individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - d. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from c);
 - e. the number of gallons of each coating employed;
 - f. the name and identification of each cleanup/solvent material employed;
 - g. the VOC content of each cleanup/solvent material employed;
 - h. the individual HAP content of each HAP of each cleanup/solvent material in pounds of individual HAP per gallon cleanup/solvent material, as applied;
 - i. the total combined HAP content of each cleanup/solvent material in pounds of combined HAPs per gallon of cleanup/solvent material, as applied (sum of all individual HAP contents from h.)
 - j. the number of gallons of each cleanup/solvent material employed;
 - k. the total VOC emissions from all coating, in pounds or tons per rolling, 12-month period (the sum of b. times e. for each coating);
 - l. the total VOC emissions from all cleanup/solvent materials, in pounds or tons per rolling, 12-month period (the sum of g. times j. for each cleanup/solvent material);
 - m. the total individual HAP emissions for each HAP from all coating and cleanup/solvent material in pounds or tons per rolling, 12-month period (for each HAP the sum of c. times e. for each coating and the sum of h. times j. for each cleanup/solvent material); and
 - n. The total combined HAP emissions from all coating and cleanup/solvent materials employed, in pounds or tons per month and pounds or tons per rolling,

12-month period (the sum of d. times e. for each coating plus the sum of i. times j. for each cleanup/solvent material).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting you Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvent contained in the interior coatings or clean materials. This information does not have to be kept on a line by line basis.

- (3) The permittee shall collect and record the total number of gallons of coatings mixed each month for the mixing operation.
- (4) The permittee shall calculate and record the total number of gallons of coating mixed each year in the mixing operation (the annual gallons of coatings mixed shall be calculated by summing the monthly gallons mixed from Section d)(3).
- (5) The permittee shall collect and record the total number of hours this emissions unit was in operation each day.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following for **P003**:
 - a. all deviations (excursions of the following emission limitations, operational restrictions and/or control device operating parameters limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping and/or testing requirements in this permit:
 - i. the rolling, 12-month VOC emission limitation;
 - ii. the rolling, 12-month total individual HAP emission limitation; and
 - iii. the rolling, 12-month total combined HAP emissions limitation.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter. These reports shall be submitted in accordance with the reporting requirements

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

1.98 lbs VOC/hr

Applicable Compliance Method:

Multiply the maximum number of mixing units operated in an hour (9 units) by the maximum VOC emissions from mixing (0.22 lb VOC/hr of mixing).

b. Emission Limitation:

19.8 lbs VOC/day

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section d)(1)d.

c. Emission Limitation:

3.1 tpy VOC

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section d)(2).

d. Emission Limitation:

The maximum annual gallons of coating mixed in this emissions unit shall not exceed 51,721.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section d)(4).

e. Emission Limitation:

The maximum daily operating hours for this emissions unit shall not exceed 10 hours.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section d)(5).

f. Emission Limitation:

The maximum annual operating hours for this emissions unit shall not exceed 3,120 hours.

Applicable Compliance Method:

Compliance shall be based upon the summation of the operating hours specified in Section d)5.

g. Emission Limitation for **K001, K002, K003, and P003combined:**

VOC emissions from the application of interior coatings and cleanup/solvent combined shall not exceed 88.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section d)(1)k.-l.

h. Emissions Limitation for **K001, K002, K003, and P003combined:**

Individual HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 combined shall not exceed 9.9 tons per rolling, 12-month period.

Combined HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 shall not exceed 24.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section d)(1)m.-n.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Coating Process: K001,K002,K003,

EU ID	Operations, Property and/or Equipment Description
K001	Drum Lining Line (Two drum lining spray booths).
K002	Exterior drum coating line (spray paint booth and one 3.15 mmBtu/hr baking oven).
K003	Lid and Bottom Coating (Two Paint Booths)

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. d)(8)-(11), and e)(5)

(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. 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 by PTI 01-06362, issued final 12/28/2006)	<p><u>For K001:</u></p> <p>Volatile organic compound (VOC) emissions from the application of interior coatings in this emissions unit shall not exceed 28.90 pounds per hour (lbs/hr).</p> <p>VOC emissions from the application of interior coatings in this emissions unit shall not exceed 46.22 tons per year (tpy).</p> <p>VOC emissions from the application of cleanup materials in this emissions unit shall not exceed 6.76 tpy.</p> <p>Particulate emissions (PE) from this emissions unit shall not exceed 2.41 tpy.</p>

Final Permit-to-Install and Operate

MAUSER USA, LLC

Permit Number: P0082943

Facility ID: 0125041529

Effective Date: 8/22/2011

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p><u>For K002:</u></p> <p>VOC emissions from the application of coatings in this emissions unit shall not exceed 48.30 lbs/hr.</p> <p>VOC emissions from the applications of coatings materials in this emissions unit shall not exceed 34.99 tpy.</p> <p>VOC emissions from the application of cleanup materials in this emissions unit shall not exceed 6.76 tpy.</p> <p>Emissions from natural gas usage in the associated oven shall not exceed:</p> <p>0.32 lbNO_x/hr; 1.38 tpyNO_x; 0.002 lb SO₂/hr; 0.01 tpy SO₂; 0.27 lb CO/hr; 1.16 tpy CO; 0.03 lb PE/hr; 0.10 tpy PE; 0.02 lb VOC/hr; and 0.02 tpy VOC</p> <p><u>For K003:</u></p> <p>VOC emissions from the application of interior coatings in this emissions unit shall not exceed 11.8 lbs/hr.</p> <p>VOC emissions from the application of interior coatings materials in this emissions unit shall not exceed 46.22 tpy.</p> <p>VOC emissions from the application of cleanup for this emissions unit shall not exceed 6.76 tpy.</p> <p>PE from this emissions unit shall not exceed 2.41 tpy.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p><u>For K001 and K003:</u></p> <p>Emissions from natural gas usage in the associated oven, shared by K001 and K003, combined shall not exceed:</p> <p>0.72 lbNO_x/hr; 3.15 tpyNO_x; 0.001 lb SO₂; 0.02 tpy SO₂; 0.605 lb CO/hr; 2.65 tpy CO; 0.055 lb PE/hr; 0.24 tpy PE; 0.04lb VOC/hr; and 0.17 tpy VOC</p> <p><u>For K001, K002, and K003:</u></p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-21-09(U)(1)(e).</p> <p>See b)(2)a. – b.</p>
b.	OAC rule 3745-17-11(C)	<p><u>For K001, K002, and K003:</u></p> <p>See b)(2)c., c)(3), d)(3)-(7), and e)(3)a.vi.</p>
d.	OAC rule 3745-21-09(U)(1)(e)	<p><u>For K001 and K003:</u></p> <p>4.3 lbs VOC/gallon of interior coating, excluding water and exempt solvents.</p>
c.	OAC rule 3745-21-09(U)(1)(f)	<p><u>For K002:</u></p> <p>3.5 lbs VOC/gallon of exterior coating, excluding water and exempt solvents.</p>
d.	<p>OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT)</p> <p>(Established by PTI 01-06362, issued final 12/28/2006)</p>	<p><u>For K001, K002, K003, and P003 combined:</u></p> <p>VOC emissions from all coatings and cleanup/solvent materials employed in the emissions units K001, K002, K003, and P003 combined shall not exceed 88.0 tons per rolling, 12-month period.</p> <p>Individual HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002,</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		K003, and P003 combined shall not exceed 9.9 tons per rolling, 12-month period. Combined HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 combined shall not exceed 24.9 tons per rolling, 12-month period. See c)(1) – (2)
e.	ORC 3704.03(F)	See d)(8) – (11), and e)(5)

(2) Additional Terms and Conditions

- a. The hourly VOC emission limitations for these emissions units were established to reflect the potential to emit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limit.
- b. The hourly PE limitations for these emissions units are greater than the potential to emit as vented to dry filtration. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limit.
- c. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

c) Operational Restrictions

- (1) The maximum annual coating usage for emissions unit **K001** and **K003** combined shall not exceed 21,500 gallons for interior coatings with a maximum VOC content of 4.3 pounds per gallons based upon a rolling, 12-month summation of coating usage figures.

The maximum annual coating usage for emissions unit **K002** shall not exceed 20,000 gallons for coatings with a maximum VOC content of 3.5 pounds per gallon, based upon a rolling, 12-month summation of coating usage figures.

These emissions units have 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 coatings usage, upon issuance of this permit.

- (2) The maximum annual cleanup material usage for emissions units **K001**, **K002**, and **K003** combined shall not exceed 1,800 gallons, based upon a rolling, 12-month summation of cleanup/solvent material usage figures.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the cleanup/solvent material usage, upon issuance of this permit.

- (3) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall collect and record the following information each month for emissions unit **K001**, **K002**, and **K003**, and **P003**:
- a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, as applied;
 - c. the individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - d. the total combined HAP content for each HAP of each coating in pounds of combined HAPs per gallon of coating, as applied (sum of all individual HAP contents from c);
 - e. the number of gallons of each coating employed;
 - f. the name and identification of each cleanup/solvent material employed;
 - g. the VOC content of each cleanup/solvent material employed;
 - h. the individual HAP content of each HAP of each cleanup/solvent material in pounds of individual HAP per gallon cleanup/solvent material, as applied;
 - i. the total combined HAP content of each cleanup/solvent material in pounds of combined HAPs per gallon of cleanup/solvent material, as applied (sum of all individual HAP contents from h.)
 - j. the number of gallons of each cleanup/solvent material employed;
 - k. the total VOC emissions from all coating, in pounds or tons per rolling, 12-month period (the sum of b. times e. for each coating);
 - l. the total VOC emissions from all cleanup/solvent materials, in pounds or tons per rolling, 12-month period (the sum of g. times j. for each cleanup/solvent material);
 - m. the total individual HAP emissions for each HAP from all coating and cleanup/solvent material in pounds or tons per rolling, 12-month period (for each HAP the sum of c. times e. for each coating and the sum of h. times j. for each cleanup/solvent material); and
 - n. The total combined HAP emissions from all coating and cleanup/solvent materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of d. times e. for each coating plus the sum of i. times j. for each cleanup/solvent material).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting you Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvent contained in the interior coatings or clean materials. This information does not have to be kept on a line by line basis.

- (2) The permittee shall collect and record the following information each day for each emissions unit **K001**, **K002**, and **K003**:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - c. the daily weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (8) The permit to install for emissions units **K001**, **K002**, and **K003** was evaluated based on the actual materials and the design parameters of this emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

For **K001**, **K002**, and **K003**:

Pollutant: Toluene

TLV (mg/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 3.50

Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m³): 393.49

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4476

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m³): 205

Maximum Hourly Emission Rate (lbs/hr): 8.30

Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m³): 931.25

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4880.95

Pollutant: Methyl Ethyl Ketone

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 21.84

Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m³): 2516.05

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 14,047.62

Pollutant: Phenol
TLV (mg/m3): 19
Maximum Hourly Emission Rate (lbs/hr): 3.62
Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3):
406.60
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 452.38

- (9) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the “Air Toxic Policy” is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the “Air Toxic Policy” will be satisfied. If, upon evaluation, the permittee determines that the “Air Toxic Policy” will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the “Air Toxic Policy” include the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emissions of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists’ (ACGIH’s) handbook entitled “TLVs and BEIs” (“Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposures Indices”); and
 - b. changes in the composition of the materials, or use of new materials, that would result in the increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g. increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (10) If the permittee determines that the “Air Toxic Policy” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a “modification” under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the air toxic contaminant emissions are greater than the de minimis level in OAC rule 3745-31-05. If the change(s) meet(s) the definition of a “modification” under other provisions of the rule, then the permittee shall obtain a final federally enforceable permit-to-install and operate (FEPTIO) prior to the change.
- (11) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the “Air Toxic Policy”:
- a. a description of the parameters changed (composition of materials, new pollutants emitted, changed in stack/exhaust parameters, etc.);
 - b. documentation of the evaluation and determination that the changed emissions unit(s) still satisfies the “Air Toxic Policy”; and

- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

- (1) The permittee shall notify the Ohio EPA, Central District in writing of any monthly record showing the use of noncompliant coatings (i.e. for VOC content) in **K001**, **K002**, and **K003**. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.
- (2) The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the filtration system was not in service when the emissions units were in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days after the event has occurred.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the following for **K001**, **K002**, and **K003**:
 - a. all deviations (excursions of the following emission limitations, operational restrictions and/or control device operating parameters limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping and/or testing requirements in this permit:
 - i. the rolling, 12-month coating usage limitation;
 - ii. the rolling, 12-month cleanup/solvent usage emission limitation;
 - iii. the rolling, 12-month VOC emission limitation;
 - iv. the rolling, 12-month total individual HAP emission limitation; and
 - v. the rolling, 12-month total combined HAP emissions limitation; and
 - vi. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.
 - 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. These reports shall be submitted in accordance with the reporting requirements

- (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.
 - (5) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
 - (6) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation K001:

VOC emissions from the application of interior coatings of this emissions unit shall not exceed 28.90 lbs/hr

Applicable Compliance Method:

Compliance may be based upon multiplying the maximum hourly coating usage (6.72 gals/hr) by the maximum VOC content of the coating (4.3 lbs/gal).
 - b. Emission Limitation for K001:

VOC emissions from the application of interior coatings shall not exceed 46.22 tpy

VOC emissions from the application of cleanup/solvent materials shall not exceed 6.76 tpy

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section d)(1)l.
 - c. Emission Limitation for K002:

VOC emissions from the application of interior coatings shall not exceed 34.99 tpy

VOC emissions from the application of cleanup/solvent materials shall not exceed 6.76 tpy

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section d)(1)l.

d. Emission Limitation **K003**:

VOC emissions from the application of interior coatings of this emissions unit shall not exceed 11.83 lbs/hr

Applicable Compliance Method:

Compliance may be based upon multiplying the maximum hourly coating usage (2.75 gals/hr) by the maximum VOC content of the coating (4.3 lbs/gal).

e. Emission Limitation for **K003**:

VOC emissions from the application of interior coatings shall not exceed 46.22 tpy

VOC emissions from the application of cleanup/solvent materials shall not exceed 6.76 tpy

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section d)(1)l.

f. Emission Limitation(s) for **K001** and **K003**, combined:

Emissions from natural gas usage in the associated oven shall not exceed:

NO_x – 0.72 lb/hr, 3.15 tpy

CO – 0.605 lb/hr, 2.65 tpy

SO₂ – 0.004 lb/hr, 0.02 tpy

PE – 0.055 lb/hr, 0.24 tpy

VOC – 0.040 lb/hr, 0.17 tpy

Applicable Compliance Method(s):

NO_x emissions from the natural gas usage in the associated oven may be determined by multiplying an emissions factor of 100 lb of NO_x/mmscf by the associated oven's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-

2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

CO emissions from the natural gas usage in the associated oven may be determined by multiplying an emissions factor of 84 lb of CO/mmscf by the associated oven's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

SO₂ emissions from the natural gas usage in the associated oven may be determined by multiplying an emissions factor of 0.6 lb of SO₂/mmscf by the associated oven's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C.

PEmissions from the natural gas usage in the associated oven may be determined by multiplying an emissions factor of 1.9 lb of NO_x/mmscf by the associated oven's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 1-5.

VOC emissions from the natural gas usage in the associated oven may be determined by multiplying an emissions factor of 5.5 lb of VOC/mmscf by the associated oven's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760 hrs/yr, and dividing by 2000 lbs/ton).

g. Emission Limitation(s) for K002:

Emissions from natural gas usage in the associated oven shall not exceed:

NO_x – 0.32 lb/hr, 1.38 tpy

CO – 0.27 lb/hr, 1.16 tpy

SO₂ – 0.002 lb/hr, 0.01 tpy

PE – 0.03 lb/hr, 0.10 tpy

VOC – 0.02 lb/hr, 0.08 tpy

Applicable Compliance Method(s):

NO_x emissions from the natural gas usage in the associated oven may be determined by multiplying an emissions factor of 100 lb of NO_x/mmscf by the associated oven's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

CO emissions from the natural gas usage in the associated oven may be determined by multiplying an emissions factor of 84 lb of CO/mmscf by the associated oven's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

SO₂ emissions from the natural gas usage in the associated oven may be determined by multiplying an emissions factor of 0.6 lb of SO₂/mmscf by the associated oven's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C.

PE emissions from the natural gas usage in the associated oven may be determined by multiplying an emissions factor of 1.9 lb of NO_x/mmscf by the associated oven's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 1-5.

VOC emissions from the natural gas usage in the associated oven may be determined by multiplying an emissions factor of 5.5 lb of VOC/mmscf by the associated oven's maximum hourly fuel usage of 0.0072 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2 (7/98). If required, the permittee shall demonstrate compliance with this

emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760 hrs/yr, and dividing by 2000 lbs/ton).

h. Emission Limitation for **K001, K002, and K003:**

PE shall not exceed 2.41 tpy

Applicable Compliance Method:

Compliance with the annual limitation may be determined by multiplying the maximum hourly particulate rate, determined from f)(1)i. above, by 8760 hrs/yr then divided by 2000 lbs/ton. Therefore, compliance with the annual limit shall be assumed provided compliance is maintained with the lb/hr limit.

i. Emission Limitation for **K001 and K003:**

4.3 lbs VOC/gal of all interior coating (excluding water and exempt solvents)

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section d)(1). USEPA Method 24 shall be used to determine the VOC contents for 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 interior coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that interior coating to demonstrate compliance until USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

j. Emission Limitation for **K002 and K003:**

3.5 lbs VOC/gal of all interior coating (excluding water and exempt solvents)

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section d)(1). USEPA Method 24 shall be used to determine the VOC contents for 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 interior coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that interior coating to demonstrate compliance until USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

k. Emission Limitation for **K001, K002, K003, and P003 combined:**

VOC emissions from the application of interior coatings and cleanup/solvent combined shall not exceed 88.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section d)(1)k.-l.

I. Emissions Limitation for **K001, K002, K003, and P003combined:**

Individual HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 combined shall not exceed 9.9 tons per rolling, 12-month period.

Combined HAP emissions from all coatings and cleanup/solvent materials employed in emissions units K001, K002, K003, and P003 shall not exceed 24.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section d)(1)m.-n.

g) Miscellaneous Requirements

- (1) None.