



Environmental Protection Agency

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

10/14/2011

JAMES OSTEEN  
Sam Dong Ohio, Inc.  
801 PITTSBURGH DR  
DELAWARE, OH 43015

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

Facility ID: 0121010196  
Permit Number: P0108635  
Permit Type: Initial Installation  
County: Delaware

Certified Mail

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

Dear Permit Holder:

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

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

and Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification  
Ohio EPA-CDO





Permit Strategy Write-Up

1. Check all that apply:

X Synthetic Minor Determination

Netting Determination

2. Source Description:

Installation of DG (double glass) and PG(polyester glass) insulated wire processing lines at the facility.

3. Facility Emissions and Attainment Status:

The facility is currently classified as NTV. Delaware County is in non-attainment for the annual PM2.5 and attainment for the 24-hour PM2.5 standard and the 8 hour ozone standard.

4. Source Emissions:

- For the purpose of determining PTE emissions will be calculated from the DG line because emissions are higher from this process

Pollutant: VOC

Givens:

- Hourly Usage - 0.18 gal/hr
As Applied Ratio -

Table with 2 columns: Description, Mixing Ratio. Rows include PED 923-50 Hermetic Epoxy (Resin) with ratio 1, and Xylene (Thinner) with ratio 1.26.

\*Source - Facility

- Density -

Table with 2 columns: Description, Density (lb/gal). Rows include PED 923-50 Hermetic Epoxy (Resin) with density 8.47, and Xylene (Thinner) with density 7.26.

\*Source - MSDS

- VOC Content -



Description	VOC Content (lb/gal)
PED 923-50 Hermetic Epoxy (Resin)	5.50
Xylene (Thinner)	7.26

\*Source – MSDS

Per Line Calculations:

$$(1 * 5.50 \text{ lb/gal}) + (1.26 * 7.26 \text{ lb/gal}) / (1 + 1.26) = 6.48 \text{ lb VOC/gal}$$

$$(0.18 \text{ gal/hr}) * (6.48 \text{ lb/gal}) = 1.17 \text{ lb VOC/hr}$$

$$(1.17 \text{ lb VOC/hr}) * (8760 \text{ hr/yr}) * (2000 \text{ lb/ton}) = 5.12 \text{ tpy}$$

Project Calculations:

$$(1.17 \text{ lb/hr}) * (5 \text{ lines}) = 5.85 \text{ lb VOC/hr}$$

$$(5.12 \text{ tpy}) * (5 \text{ lines}) = 25.60 \text{ tpy}$$

Pollutant:      **Single HAP - Xylene**

Givens:

- Hourly Usage – 0.18 gal/hr
- Xylene Content Per Material –

Description	% Xylene
PED 923-50 Hermetic Epoxy (Resin)	30
Xylene (Thinner)	100

\*Source - Facility

- Density –

Description	Density (lb/gal)
PED 923-50 Hermetic Epoxy (Resin)	8.47
Xylene (Thinner)	7.26

\*Source - MSDS

- Xylene Content –

Description	Xylene Content (lb/gal)
PED 923-50 Hermetic Epoxy (Resin)	2.54
Xylene (Thinner)	7.26

\*Source – MSDS



Per Line Calculations:

$(1 * 2.54 \text{ lb/gal}) + (1.26 * 7.26 \text{ lb/gal}) / (1 + 1.26) = 5.17 \text{ lb Xylene/gal}$   
 $(0.18 \text{ gal/hr}) * (5.17 \text{ lb/gal}) = 0.93 \text{ lb Xylene/hr}$   
 $(0.93 \text{ lb/hr}) * (8760 \text{ hr/yr}) * (2000 \text{ lb/ton}) = 4.07 \text{ tpy}$

Project Calculations:

$(0.93 \text{ lb/gal}) * (5 \text{ lines}) = 4.65 \text{ lb Xylene/hr}$   
 $(4.07 \text{ tpy}) * (5 \text{ lines}) = 20.35 \text{ tpy}$

5. Conclusion:

The facility is required to obtain a synthetic minor permit to limit HAP emissions below major source thresholds. HAP emission limitations will be established as rolling, 12- month 9.9/24.9 tpy and compliance with the limitations will be maintained by monitoring and recordkeeping.

VOC emissions are less than 10 tpy. BAT for VOC emissions was developed at PTE and sunset language was included in the Additional Terms and Conditions.

6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	<u>25.6 tpy</u>
<u>Single HAP</u>	<u>9.9</u>
<u>Combined HAPs</u>	<u>24.9</u>



PUBLIC NOTICE

10/14/2011 Issuance of Draft Air Pollution Permit-To-Install and Operate

Sam Dong Ohio, Inc.  
801 PITTSBURGH DR,  
Delaware, OH 43015  
Delaware County

FACILITY DESC.: Copper Rolling, Drawing, and Extruding

PERMIT #: P0108635

PERMIT TYPE: Initial Installation

PERMIT DESC: Initial installation for (3) double glass and (2) polyester glass insulated wire processing lines that have already been installed. The facility currently has a facility-wide restriction for HAPs.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: [epa.ohio.gov/dapc/permit](http://epa.ohio.gov/dapc/permit) by entering the permit # or: Stephanie Habinak, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Sam Dong Ohio, Inc.**

Facility ID:	0121010196
Permit Number:	P0108635
Permit Type:	Initial Installation
Issued:	10/14/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install and Operate
for
Sam Dong Ohio, Inc.

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## Authorization

Facility ID: 0121010196  
 Application Number(s): A0042372  
 Permit Number: P0108635  
 Permit Description: Initial installation for (3) double glass and (2) polyester glass insulated wire processing lines that have already been installed. The facility currently has a facility-wide restriction for HAPs.  
 Permit Type: Initial Installation  
 Permit Fee: \$2,000.00 *DO NOT send payment at this time, subject to change before final issuance*  
 Issue Date: 10/14/2011  
 Effective Date: To be entered upon final issuance  
 Expiration Date: To be entered upon final issuance  
 Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Sam Dong Ohio, Inc.  
 801 PITTSBURGH DR  
 Delaware, OH 43015

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: P0108635  
Permit Description: Initial installation for (3) double glass and (2) polyester glass insulated wire processing lines that have already been installed. The facility currently has a facility-wide restriction for HAPs.

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

**Group Name: Wire Coating Lines**

<b>Emissions Unit ID:</b>	<b>P015</b>
Company Equipment ID:	DG Line #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P016</b>
Company Equipment ID:	DG Line #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P017</b>
Company Equipment ID:	DG Line #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P018</b>
Company Equipment ID:	PG Line #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P019</b>
Company Equipment ID:	PG Line #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

## **A. Standard Terms and Conditions**

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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, 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 submitting<sup>1</sup> 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.

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

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

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

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

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

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

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

## **B. Facility-Wide Terms and Conditions**

**Draft Permit-to-Install and Operate**

Sam Dong Ohio, Inc.

**Permit Number:** P0108635

**Facility ID:** 0121010196

**Effective Date:** To be entered upon final issuance

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

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

1. Emissions Unit Group -Wire Coating Lines: P015,P016,P017,P018,P019,

EU ID	Operations, Property and/or Equipment Description
P015	Double Glass Insulated Wire Processing Line #1
P016	Double Glass Insulated Wire Processing Line #2
P017	Double Glass Insulated Wire Processing Line #3
P018	Polyester Glass Insulated Wire Processing Line #1
P019	Polyester Glass Insulated Wire Processing Line #2

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

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

a. None.

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	<p>Volatile organic compounds (VOC), per line, shall not exceed:</p> <p>1.17 pound per hour (lb/hr) and 5.12 tons per year (tpy)</p> <p>See b)(2)a. and b.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006	See b)(2)c.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. The hourly and yearly VOC emission limitations are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, recordkeeping and/or reporting requirements to ensure compliance with these limits.
- c. The rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from these air contaminant sources since the uncontrolled potential to emit for each air contaminant source is less than 10 tons/year.
- d. This permit establishes the following federally enforceable limitations on emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, for the purpose of avoiding Maximum Achievable Control Technology (MACT) regulations and Title V permitting requirements:
  - i. The actual emissions from B001, B002, P001, P002, P003, P005, P006, P007, P013, P014, P015, P016, P017, P018, P019, and T001 (all emission sources at the facility), including but not limited to any de minimis emissions units as defined in OAC rule 3745-15-05, or any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 9.9 tons for any single HAP, based upon a rolling, 12-month summation.
  - ii. The actual emissions from all emission sources at the facility, including but not limited to any de minimis emissions units as defined in OAC rule 3745-15-05, or any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 24.9 tons for any combination of HAPs, based upon a rolling, 12-month summation.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all emission sources at the facility, including but not limited to any de minimis emissions units as defined in OAC rule 3745-15-05, or any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, that employ HAP containing materials:
  - a. the name and identification number of each coating, as applied;
  - b. the individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. 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 b);
  - d. the number of gallons of each coating employed;
  - e. the name and identification of each cleanup/solvent material employed;
  - f. the individual HAP content of each HAP of each cleanup/solvent material in pounds of individual HAP per gallon cleanup/solvent material, as applied;
  - g. 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 f.)
  - h. the number of gallons of each cleanup/solvent material employed;
  - i. 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 b. times d. for each coating and the sum of f. times h. for each cleanup/solvent material); and
  - j. 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 c. times e. for each coating plus the sum of g. times h. 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.

e) Reporting Requirements

- (1) 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.

**Draft Permit-to-Install and Operate**

Sam Dong Ohio, Inc.

**Permit Number:** P0108635

**Facility ID:** 0121010196

**Effective Date:** To be entered upon final issuance

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

(3) The permittee shall submit quarterly deviation (excursion) reports that identify:

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

i. any exceedance of the rolling, 12-month individual HAP emission limitation for each HAP; and

ii. any exceedance of the rolling, 12-month total combined HAPs emission limitation.

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.

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

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:

Emissions of any single HAP shall not exceed 9.9 tons per rolling, 12-month period.

Emissions of total combined HAPS 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).

g) Miscellaneous Requirements

(1) None.