

Facility ID: 0278060693 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

- [Go to Part II for Emissions Unit K001](#)
- [Go to Part II for Emissions Unit K004](#)
- [Go to Part II for Emissions Unit K005](#)
- [Go to Part II for Emissions Unit K006](#)

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Facility ID: 0278060693 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - electro deposition tank with new bake oven	OAC rule 3745-31-05(A)(3) PTI No. 02-18388	see A.2.a and b
E-coat line no. 1- Tank B	OAC rule 3745-35- 07(B) OAC rule 3745-21-09(U)	see A.2.c and d The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) The volatile organic compound (VOC) content shall not exceed 0.41 pounds of VOC per gallon of coating, excluding water and exempt solvent(s), on a daily volume-weighted average. The emissions from the coatings employed in this emissions unit shall not exceed 84.3 pounds of VOC per day based on an average for each calendar month. The total VOC emissions from this emissions unit shall not exceed 15.4 tons per year, based upon a rolling, 12-month summation of the monthly emissions. The permittee shall limit emissions from emissions units K001, K004, K005, and K006 to 60.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. The permittee shall use only hazardous air pollutants (HAPs) free coatings in this emissions unit.
2. The permittee shall not use more than 75,000 gallons of coatings per rolling, 12-month period.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit: the name, identification, and type of each coating, as applied; the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; the daily volume-weighted average VOC content of all coatings used, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2; and for any coatings used, whether or not the coatings contain any HAPs.
2. The permittee shall collect, record and calculate the following information monthly for this emissions unit: the name and identification number of each coating used; the VOC content (excluding water and exempt solvents), in pounds per gallon, of each coating; the total number of gallons (excluding water and exempt solvents) of each coating used for the month; the total monthly VOC emissions from this line, i.e., the summation of (b) times (c) for all coatings employed; the number of days the emissions unit was in operation each month; the average daily VOC emission rate for all coatings employed, i.e., (d/e), in pounds/day (average); and the rolling, 12-month summation of the coating usage in gallons each month.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content(s) exceeded the applicable limitation(s). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
 2. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any record for this line showing that the average daily VOC emissions exceeded the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
 3. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
 4. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any record for this line showing that HAPs containing coatings were employed. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
 5. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any record for this line showing exceedances of the rolling, 12-month coating usage limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
 6. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing the rolling 12-month summation of the monthly emissions from emissions units K001, K004, K005, and K006 exceeded 60.9 tons per year. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
- E. Testing Requirements**
1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:
0.41 lbs VOC/gallon coating excluding water and exempt solvents, as a daily volume-weighted average.
Applicable Compliance Method:
OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
Emission Limitation:
84.3 pounds of VOC per day based on an average for each calendar month.
Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section C.2.
Emission Limitation:
15.4 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
Applicable Compliance Method:
Compliance shall be based upon the summation of the monthly records from the record keeping specified in Section C.2.
Emission Limitation:
60.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions from emissions units K001, K004, K005, and K006.
Applicable Compliance Method:
Compliance shall be based upon the summation of the monthly records from the record keeping specified in Section C.2 for emissions units K001, K004, K005, and K006.
- F. Miscellaneous Requirements**
1. The following Terms and Conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC Rule 3745-35-07: A. through F.
 2. The following Terms and Conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install number 02-6497: A. through F.

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Facility ID: 0278060693 Emissions Unit ID: K004 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K004 - electrodeposition tank with new bake oven E-coat line no. 2- Tank A	OAC rule 3745-31-05(A)(3) PTI No. 02-18388	see A.2.a and b
	OAC rule 3745-35- 07(B) OAC rule 3745-21-09(U)	see A.2.c and d The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) The volatile organic compound (VOC) content shall not exceed 0.41 pounds of VOC per gallon of coating, excluding water and exempt solvent(s), on a daily volume-weighted average. The emissions from the coatings employed in this emissions unit shall not exceed 84.3 pounds of VOC per day based on an average for each calendar month. The total VOC emissions from this emissions unit shall not exceed 15.4 tons per year, based upon a rolling, 12-month summation of the monthly emissions. The permittee shall limit emissions from emissions units K001, K004, K005, and K006 to 60.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. The permittee shall use only hazardous air pollutants (HAPs) free coatings in this emissions unit.
2. The permittee shall not use more than 75,000 gallons of coatings per rolling, 12-month period.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - the name, identification, and type of each coating, as applied;
 - the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - the daily volume-weighted average VOC content of all coatings used, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2; and
 - for any coatings used, whether or not the coatings contain any HAPs.
2. The permittee shall collect, record and calculate the following information monthly for this emissions unit:
 - the name and identification number of each coating used;
 - the VOC content (excluding water and exempt solvents), in pounds per gallon, of each coating;
 - the total number of gallons (excluding water and exempt solvents) of each coating used for the month;
 - the total monthly VOC emissions from this line, i.e., the summation of (b) times (c) for all coatings employed;
 - the number of days the emissions unit was in operation each month;
 - the average daily VOC emission rate for all coatings employed, i.e., (d/e), in pounds/day (average); and
 - the rolling, 12-month summation of the coating usage in gallons each month.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content(s) exceeded the applicable limitation(s). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
2. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any record for this line showing that the average daily VOC emissions exceeded the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
3. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any record for this line showing that HAPs containing coatings were employed. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
5. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any record for this line

showing exceedances of the rolling, 12-month coating usage limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

6. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing the rolling 12-month summation of the monthly emissions from emissions units K001, K004, K005, and K006 exceeded 60.9 tons per year. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:

0.41 lbs VOC/gallon coating excluding water and exempt solvents, as a daily volume-weighted average.

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Emission Limitation:

84.3 pounds of VOC per day based on an average for each calendar month.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2.

Emission Limitation:

15.4 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be based upon the summation of the monthly records from the record keeping specified in Section C.2.

Emission Limitation:

60.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions from emissions units K001, K004, K005, and K006.

Applicable Compliance Method:

Compliance shall be based upon the summation of the monthly records from the record keeping specified in Section C.2 for emissions units K001, K004, K005, and K006.

F. Miscellaneous Requirements

1. The following Terms and Conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC Rule 3745-35-07: A. through F.
2. The following Terms and Conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install number 02-77741: A. through F.

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Facility ID: 0278060693 Emissions Unit ID: K005 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or

control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K005 - electro deposition tank with bake oven E-coat line large hoist	OAC rule 3745-31-05(A)(3) PTI No. 02-18388	see A.2.a and b
	OAC rule 3745-35- 07(B) OAC rule 3745-21-09(U)	see A.2.c and d The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) The volatile organic compound (VOC) content shall not exceed 0.41 pounds of VOC per gallon of coating, excluding water and exempt solvent(s), on a daily volume-weighted average. The emissions from the coatings employed in this emissions unit shall not exceed 11.2 pounds of VOC per day based on an average for each calendar month. The total VOC emissions from this emissions unit shall not exceed 2.1 tons per year, based upon a rolling, 12-month summation of the monthly emissions. The permittee shall limit emissions from emissions units K001, K004, K005, and K006 to 60.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

- 1. The permittee shall use only hazardous air pollutants (HAPs) free coatings in this emissions unit.
- 2. The permittee shall not use more than 10,000 gallons of coatings per rolling, 12-month period.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each day for this emissions unit:
 - the name, identification, and type of each coating, as applied;
 - the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - the daily volume-weighted average VOC content of all coatings used, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2; and
 - for any coatings used, whether or not the coatings contain any HAPs.
- 2. The permittee shall collect, record and calculate the following information monthly for this emissions unit:
 - the name and identification number of each coating used;
 - the VOC content (excluding water and exempt solvents), in pounds per gallon, of each coating;
 - the total number of gallons (excluding water and exempt solvents) of each coating used for the month;
 - the total monthly VOC emissions from this line, i.e., the summation of (b) times (c) for all coatings employed;
 - the number of days the emissions unit was in operation each month;
 - the average daily VOC emission rate for all coatings employed, i.e., (d/e), in pounds/day (average); and
 - the rolling, 12-month summation of the coating usage in gallons each month.

D. Reporting Requirements

- 1. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content(s) exceeded the applicable limitation(s). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
- 2. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any record for this line showing that the average daily VOC emissions exceeded the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
- 3. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- 4. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any record for this line showing that HAPs containing coatings were employed. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
- 5. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any record for this line showing exceedances of the rolling, 12-month coating usage limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
- 6. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing the rolling 12-month summation of the monthly emissions from emissions units K001, K004, K005, and K006 exceeded 60.9 tons per year. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

E. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:
0.41 lbs VOC/gallon coating excluding water and exempt solvents, as a daily volume-weighted average.
Applicable Compliance Method:
OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a)

coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Emission Limitation:

11.2 pounds of VOC per day based on an average for each calendar month.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2.

Emission Limitation:

2.1 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be based upon the summation of the monthly records from the record keeping specified in Section C.2.

Emission Limitation:

60.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions from emissions units K001, K004, K005, and K006.

Applicable Compliance Method:

Compliance shall be based upon the summation of the monthly records from the record keeping specified in Section C.2 for emissions units K001, K004, K005, and K006.

F. Miscellaneous Requirements

1. The following Terms and Conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC Rule 3745-35- 07: A. through F.
2. The following Terms and Conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install number 02-7741: A. through F.

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Facility ID: 0278060693 Emissions Unit ID: K006 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K006 - spray booths and oven Automatic Top Coat Line	OAC rule 3745-31-05(A)(3)	see A.2.a, c, and d
	PTI No. 02-18388	
	OAC Rule 3745-35- 07(B)	see A.2.b, e, and f The emission limitation specified by this rule are equivalent to emission limitation established pursuant to OAC rule 3745-31-05(A)(3) and OAC rule 3745-21-09(U)(2)(f)(ii).
	OAC rule 3745-21-09(U)(1)	

2. Additional Terms and Conditions

- (a) The volatile organic compound (VOC) content shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvent(s), on a daily volume-weighted average, for all coatings. The emissions from the coatings employed in this emissions unit shall not exceed 155.0 pounds of VOC per day.

On days when this emissions unit is unable to meet the daily volume-weighted average VOC limitation, the permittee shall operate and maintain a VOC capture and control system (for spray booths, flash-off areas and bake oven) that shall provide not less than an 81% overall control of VOC emissions and a control system (thermal incinerator) that shall provide an efficiency (percent destruction) of not less than 90%, by weight, for VOC emissions vented to the control equipment.

The emission from this emissions unit shall not exceed 8.7 pounds per hour of VOC when using the VOC capture and control system.

The emissions from this emissions unit shall not exceed:

- i. 28.0 tons per year of VOC;
- ii. 9.6 tons/year of any individual HAP; and
- iii. 20.5 tons/year of total aggregate HAPS,

based upon a rolling, 12-month summation of the monthly emissions.

The permittee shall limit emissions from emissions units K001, K004, K005, and K006 to 60.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

- 1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit and its control system are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit and its control system are in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- 2. The permittee shall collect and record the following information for each day for the coating line and control equipment, when it is in operation:
 - a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
- 3. The permittee shall collect and record the following information each day for this emissions unit:
 - the name and identification of each coating, as applied;
 - the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - the daily volume-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 CVOC₂;
 - the name and identification of each cleanup material employed;
 - the number of gallons of each cleanup material employed;
 - the VOC content of each cleanup material, in pounds per gallon;
 - the total uncontrolled VOC emissions from all coatings and cleanup materials employed, in pounds or tons; and
 - on days when the capture and control system are in use, the calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds per day and in tons per year (year to date). The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.
- 4. The permittee shall collect and record the following information each month:
 - the name and identification number of each coating, as applied;
 - the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, as applied, as a weight fraction;
 - the total combined Hazardous Air Pollutant (HAPs) content for each coating, as applied, as a weight fraction (i.e., sum all the individual HAP contents from b);
 - the number of gallons of each coating employed;
 - the density of each coating employed;
 - the name and identification of each cleanup material employed;
 - the individual HAP content for each HAP of each cleanup material, as applied, as a weight fraction;
 - the total combined HAPs content of each cleanup material, as applied, as a weight fraction (i.e., sum all the individual HAP contents from g);
 - the number of gallons of each cleanup material employed;
 - the density of each cleanup material, as employed;
 - the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons (i.e., for each HAP, the sum of (b) times (d) times (e) for each coating plus the sum of (g) times (i) times (j) for each cleanup material);
 - the total combined HAPs emissions from all coatings and cleanup materials employed, in tons (i.e., the sum of (c) times (d) times (e) for each coating plus the sum of (h) times (i) times (j) for each cleanup material); and
 - the rolling, 12-month individual HAP emissions (for each HAP) and the rolling, 12-month combined HAPs emissions from all coatings and cleanup materials employed, in tons.

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

- 5. The permittee shall maintain daily records that document any time periods when the dry filtration system was not

in service when the emissions unit was in operation.

6. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate Modeled (lbs/hr): 2.89

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 299

MAGLC (ug/m3): 10333

Pollutant: toluene

TLV (mg/m3): 377

Maximum Hourly Emission Rate Modeled (lbs/hr): 5.26

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 8976

MAGLC (ug/m3): 548

Pollutant: naphthalene

TLV (mg/m3): 52

Maximum Hourly Emission Rate Modeled (lbs/hr): 2.42

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 249

MAGLC (ug/m3): 1238

Pollutant: methyl amyl ketone

TLV (mg/m3): 233

Maximum Hourly Emission Rate Modeled (lbs/hr): 1.37

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 141

MAGLC (ug/m3): 5547

Pollutant: n butyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate Modeled (lbs/hr): 0.98

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 99

MAGLC (ug/m3): 16976

Pollutant: methyl isobutyl ketone

TLV (mg/m3): 205

Maximum Hourly Emission Rate Modeled (lbs/hr): 0.69

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 75

MAGLC (ug/m3): 4880

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 still 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an 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.).

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit 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.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the daily volume-weighted average VOC content(s) exceeded the applicable limitation(s). Notification is not necessary on days when this emissions unit control system is operated. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
2. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any record for this line showing that the daily VOC emissions exceeded the applicable limitation(155.0 pounds of VOC per day). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
3. The permittee shall submit quarterly summaries of the following records:
 - a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
4. The permittee shall notify the Director of any monthly record showing any deviation from the following:
 - the total individual HAP emissions limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling 12 month period; and
 - the total combined HAP emissions limitation from all coatings and cleanup materials employed, in pounds or tons per rolling 12 month period.

These reports shall include a description of the deviation, as well as the corrective actions that were taken to achieve compliance. The permittee shall submit annual reports which identify all exceedances of the above limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

5. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing the rolling 12-month summation of the monthly emissions from emissions units K001, K004, K005, and K006 exceeded 60.9 tons per year. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
6. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
7. The permittee shall submit annual reports that specify the VOC, individual HAP, and total combined HAPs emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:

3.5 lbs VOC/gallon coating, excluding water and exempt solvents, as a daily volume-weighted average for all coatings, excluding water and exempt solvents, as a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3. USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Emission Limitation:

155.0 pounds of VOC per day based on an average for each calendar month.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

Emission Limitation:

28.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be based upon the summation of the daily records from the record keeping specified in Section C.3.

Emission Limitation:

8.7 pounds per hour of VOC when using the VOC capture and control system.

Applicable Compliance Method:

Compliance shall be based upon the emission testing specified in Section E.2.

Emission Limitation:

60.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions from emissions units K001, K004, K005, and K006.

Applicable Compliance Method:

Compliance shall be based upon the summation of the monthly and daily records from the record keeping specified in the terms and conditions of the permit for emissions units K001, K004, K005, and K006.

Emission Limitation:

9.6 tons/year of any individual HAP; and 20.5 tons/year of total aggregate HAPS.

Applicable Compliance Method

Compliance shall be based upon the summation of the monthly records from the record keeping specified in Section C.4.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted within 3 months of the start of usage of coating which does not comply with Section A.2.a of this permit.

The emission testing shall be conducted to demonstrate compliance with the VOC capture efficiency and control efficiency requirements specified in Section A.2.c and the hourly emission rate specified in Section A.2.d.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office .

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The mass emissions testing for the purpose of complying with A.2.d shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office . The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s).

F. Miscellaneous Requirements

1. The following Terms and Conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC Rule 3745-35- 07: A. through F., except C.5.
2. The following Terms and Conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install number 02-13295: A. through F.