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

11/10/2011

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Anthony Klapac
Aleris Rolled Products, Inc.
1 REYNOLDS ROAD
ASHVILLE, OH 43103-0197

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0165000045
Permit Number: P0108619
Permit Type: Initial Installation
County: Pickaway

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this 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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Central District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
Ohio EPA-CDO; Kentucky

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Aleris Rolled Products, Inc.

Facility ID:	0165000045
Permit Number:	P0108619
Permit Type:	Initial Installation
Issued:	11/10/2011
Effective:	11/10/2011

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Aleris Rolled Products, Inc.

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Authorization

Facility ID: 0165000045
Facility Description: Architectural metal work
Application Number(s): A0042377
Permit Number: P0108619
Permit Description: Initial Installation of two new coil coating operations and one new coil preparation line
Permit Type: Initial Installation
Permit Fee: $600.00
Issue Date: 11/10/2011
Effective Date: 11/10/2011

This document constitutes issuance to:

Aleris Rolled Products, Inc.
1 REYNOLDS ROAD
Ashville, OH 43103-0197

of a Permit-to-Install 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 a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0108619
Permit Description: Initial Installation of two new coil coating operations and one new coil preparation line

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

Emissions Unit ID:	**K004**
Company Equipment ID:	Primer Coating Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K005**
Company Equipment ID:	Finishing Coating Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P010**
Company Equipment ID:	P010
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

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

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

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

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

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions,

andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Central District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Central District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

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

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

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

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

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

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

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

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

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

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Central District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a

quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as “permanently shut down” in Ohio EPA’s “Air Services” 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).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All

records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

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

   a) None.

2. Emissions from the combustion of natural gas used to heat the Regenerative Thermal Oxidizer (RTO) serving the Primer Coating Line #2 (K004) and the Finishing Coating Line #2 (K005) shall not exceed the following:

   a) Particulate emissions (PE) from natural gas combustion shall not exceed 0.0075 pound per mmBtu and 0.98 ton per year.

      Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for total filterable PE in natural gas combustion (1.9lbs of PE /MM ft^3), and total condensable PE in natural gas combustion (5.7lbs of PE /MM ft^3).

   b) Nitrogen oxide (NO_x) emissions from natural gas combustion shall not exceed 0.098 pound per mmBtu and 12.88 ton per year.

      Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-1 (7/98) for uncontrolled NO_x in natural gas combustion (100 lbs of NOx/$MMft^3$).

   c) Sulfur dioxide (SO_2) emissions from natural gas combustion shall not exceed 0.0006 pound per mmBtu and 0.08 ton per year.

      Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for SO_2 in natural gas combustion (0.6 lb of SO_2/$MMft^3$).

   d) Carbon monoxide (CO) emissions from natural gas combustion shall not exceed 0.082 pound per mmBtu and 10.82 tons per year.

      Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-1 (7/98) for CO in natural gas combustion (84 lbs of CO/$MMft^3$).

   e) Organic compound (OC) emissions from natural gas combustion shall not exceed 0.0054 pound per mmBtu and 0.71 ton per year.

      Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for volatile organic compounds (VOC) in natural gas combustion (5.5 lbs of VOC/$MMft^3$).

The hourly and annual emission limitations from natural gas combustion in the RTO were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

C. Emissions Unit Terms and Conditions

1. K004, Primer Coating Line

Operations, Property and/or Equipment Description:

Primer Coating Line

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Volatile organic compound (VOC) emissions from the coating operation, including solvent cleanup activities shall not exceed 22.41 tons per rolling 12 month period.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) from the oven natural gas combustion shall not exceed 0.0075 pound per mmBtu and 0.69 ton per year. Nitrogen oxide (NO_x) emissions from the oven natural gas combustion shall not exceed 0.098 pound per mmBtu and 9.02 ton per year. Sulfur dioxide (SO_2) emissions from the oven natural gas combustion shall not exceed 0.0006 pound per mmBtu and 0.05 ton per year. Carbon monoxide (CO) emissions from the oven natural gas combustion shall not exceed 0.082 pound per mmBtu and 7.57 tons per year. Organic compound (OC) emissions from the oven natural gas combustion shall not exceed 4.0 pounds per mmBtu and 0.5 ton per year.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b(2)a.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b(2)b.
d.	OAC rule 3745-17-07(A)	Visible particulate emissions from thermal oxidizer stack shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).
e.	OAC rule 3745-21-09(E)	VOC emissions shall not exceed 4.0 lbs/gallon of solids when using the thermal oxidizer. See b)(2)d.
f.	40 CFR Part 60, Subpart TT (40 CFR 60.460 - 466) [In accordance with 40 CFR 60.460(a) and (b) this emissions unit is a metal coil coating line at an existing surface coating facility subject to the emissions limitations and control measures specified in this section]	Compliance Option A: VOC emissions shall not exceed 0.14 kg/liter (1.17 lbs/gal) of coating solids applied for each calendar month with the use of the thermal oxidizer or Compliance Option B: VOC emissions (stack and fugitive) shall not exceed 10 percent of the VOCs applied for each calendar month (90 percent reduction with the use of the thermal oxidizer). See b)(2)e and b)(2)h.
g.	40 CFR Part 63, Subpart SSSS (40 CFR 63.5080 - 5209) [In accordance with 40 CFR 63.5090(a), this emissions unit is a metal coil coating line at an existing surface coating facility subject to the emissions limitations and control measures specified in this section]	Compliance Option A: Organic HAP emissions shall not exceed 0.046 kg/liter (0.38 lbs/gallon) of solids applied during each rolling 12-month compliance period with the use of the thermal oxidizer. or Compliance Option B: Organic HAP emissions (stack and fugitive) shall not exceed 2 percent of the organic HAP applied during each rolling 12-month compliance period (98 percent reduction).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)f and b)(2)h.
h.	40 CFR 63.1 - 16 (40 CFR 63.5140(b))	Table 2 to Subpart SSSS of 40 CFR Part 63 - Applicability of General Provisions to Subpart SSSS shows which parts of the General Provisions in 40 CFR 63.1 - 16 apply.
i.	40 CFR 60.460 - 466	NSPS Subpart TT of 40 CFR Part 60references which parts of the General Provisions in 40 CFR 60.1 - 19 apply.
j.	OAC rule 3745-17-11(B)(1)	PE from the oven natural gas combustion shall not exceed 0.020 lb/mmBtu actual heat input.

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

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the OC, PE, NOX, SO2, and CO emissions from the oven natural gas combustion since the uncontrolled potential to emit for OC, PE, NOX, SO2 and CO is less than 10 tons/yr.

c. The permittee shall demonstrate compliance with the annual VOC emission limit on a 12-month rolling average basis. The annual limit, which is equivalent to 98 percent reduction based on the coating operations uncontrolled potential to emit, may be complied with through a combination of low-VOC content coatings and/or thermal incineration.

[Authority for Term: 40 CFR Part 63, Subpart SSSS.]

d. Pursuant to OAC rule 3745-21-09(B)(6), the 81 percent overall capture and control and 90 percent destruction efficiency option is available in lieu of

complying with the 4.0 lbs/gallon solids emission limitation contained in OAC rule 3745-21-09(E).

e. Compliance with the VOC emission limitations established pursuant to 40 CFR Part 60, Subpart TT shall be demonstrated on a calendar month basis using all coating materials applied in this emissions unit.

[Authority for Term: 40 CFR Part 60, Subpart TT.]

f. Compliance with the organic HAP emission limits established pursuant to 40 CFR Part 63, Subpart SSSS shall be demonstrated on a 12-month rolling average basis using all materials applied in this emissions unit or the permittee shall limit total organic HAP emissions, to no more than 2 percent of the HAP applied for each month during each 12-month compliance period (98 percent reduction).

[Authority for Term: 40 CFR Part 63, Subpart SSSS]

g. The hourly and annual emission limitations from natural gas combustion in the coating process oven and thermal oxidizer were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

h. The permittee shall elect to use one of the following combinations of Compliance Options from 40 CFR Part 60, Subpart TT and 40 CFR Part 63, Subpart SSSS on a monthly basis:

i. Compliance Option A for 40 CFR Part 60, Subpart TT; along with either:

(a) Compliance Option A for 40 CFR Part 63, Subpart SSSS; or

(b) Compliance Option B for 40 CFR Part 63, Subpart SSSS.

ii. Compliance Option B for 40 CFR Part 60, Subpart TT; along with either:

(a) Compliance Option A for 40 CFR Part 63, Subpart SSSS; or

(b) Compliance Option B for 40 CFR Part 63, Subpart SSSS.

[Authority for Term: 40 CFR Part 60, Subpart TT and 40 CFR Part 63, Subpart SSSS]

c) Operational Restrictions

(1) See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080 - 5209)

(2) See 40 CFR Part 60, Subpart TT (40 CFR 60.460 - 466)

d) Monitoring and/or Recordkeeping Requirements

(1) See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080 - 5209) and Table I to 40 CFR Part 63, Subpart SSSS

(2) See 40 CFR Part 60, Subpart TT (40 CFR 60.460 - 466).

(3) The emission capture system shall be maintained under negative pressure whenever the emissions unit is in operation and all emissions shall be vented to the regenerative thermal oxidizer.

(4) For purposes of determining compliance with requirements in both OAC rules 3745-21-09(B)(3)(j) and (E), the permittee, when showing compliance with the VOC emissions limitation of 4.0 pounds per gallon of solids with the use of the thermal oxidizer, shall collect and record the following information for each day for emissions unit K004 and thermal oxidizer:

a. The name and identification of each coating, as applied;

b. The mass of VOC per gallon of coating solids, as applied and the solids content per gallon, as applied, and the volume, as applied, of each coating;

c. The maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;

d. The calculated controlled VOC emissions rate from coatings, in pounds of OC per gallon of coating solids, as applied;

e. The controlled VOC emissions rate from coatings shall be calculated using:

i. the overall control efficiency as determined during the most recent emissions test that demonstrated that the emissions unit was in compliance; and (ii) or (iii) below:

ii. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied); or

iii. the daily volume-weighted VOC per gallon of coating solids, as applied, recorded in d)(4)c above.

f. A log or record of operating time for the capture system, control device, monitoring equipment, and associated emissions unit; and

g. 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 emissions test that demonstrated that the emissions unit was in compliance.

(5) For purposes of compliance with the requirements of OAC rule 3745-21-09(E) pursuant to OAC rule 3745-21-09(B)(6), the permittee shall collect and record the following information each day for the thermal oxidizer:

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. 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 compliance test that demonstrated that the emissions unit was in compliance.

(6) The permittee shall collect and record the following information on a monthly basis:

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

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material, in fraction by weight;

d. the density of each VOC containing cleanup solvent used, in pounds per gallon;

e. the calculated, controlled VOC emission rate from all cleanup materials, in pounds or tons;

f. the total volume of solids from all the coatings employed, in gallons;

g. the total VOC emissions from all the coatings employed (i.e., the calculated, controlled VOC emission rate times the total volume of solids from all coatings employed in the line), in pounds or tons; and

h. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons.

e) Reporting Requirements

(1) See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080 - 5209)

(2) See 40 CFR Part 60, Subpart TT (40 CFR 60.460 - 466).

(3) The permittee shall notify Ohio EPA Central District Office in writing of any daily record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation. This notification shall include a copy of such record and shall be sent to Ohio EPA Central District Office no later than 45 days after the exceedance occurs.

(4) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. 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 emissions test that demonstrated that the emissions unit was in compliance.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(5) The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit. Annual emission reports may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

(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. Emissions Limitation: PE from oven natural gas combustion shall not exceed 0.0075 pound per mmBtuand 0.69 ton per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for total filterable PE in natural gas combustion (1.9lbs of PE /MM ft^3), and total condensable PE in natural gas combustion (5.7lbs of PE /MM ft^3).

The maximum capacity of the oven is 20600 ft^3/hr and 180,456,000 ft^3/yr.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and 202.

b. Emissions Limitation: NO_x emissions from the oven natural gas combustion shall not exceed 0.098 pound per mmBtuand 9.02 ton per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-1 (7/98) for uncontrolled NO_x in natural gas combustion (100 lbs of NOx/MMft^3).

The maximum capacity of the oven is 20600 ft^3/hr and 180,456,000 ft^3/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

c. Emission Limitation: SO_2 emissions from the oven natural gas combustion shall not exceed 0.0006 pound per mmBtuand 0.05 ton per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for SO_2 in natural gas combustion (0.6 lb of SO_2/MMft^3).

The maximum capacity of the oven is 20600 ft^3/hr and 180,456,000 ft^3/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

d. Emission Limitation: CO emissions from the oven natural gas combustion shall not exceed 0.082 pound per mmBtuand 7.57 tons per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-1 (7/98) for CO in natural gas combustion (84 lbs of CO/MMft^3).

The maximum capacity of the oven is 20600 ft^3/hr and 180,456,000 ft^3/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

e. Emission Limitation: OC emissions from the oven natural gas combustion shall not exceed 4.0 pounds per mmBtuand 0.5 ton per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for volatile organic compounds (VOC) in natural gas combustion (5.5 lbs of VOC/MMft^3).

The maximum capacity of the oven is 20600 ft^3/hr and 180,456,000 ft^3/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

f. Emission Limitation: Visible particulate emissions from thermal incinerator stack shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

g. Emission Limitation: VOC emissions from the coating operation, including solvent cleanup activities, shall not exceed 22.41 tons per year.

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the sum total of VOC emissions from the coating operations and solvent cleanup activities. VOC emissions from coating operations are determined by summing the results of the 12 previous recent monthly calculations required pursuant to d) and multiplying the results of that summation by the overall VOC control efficiency, as determined by the most recent performance test that demonstrated that the emissions unit was in compliance.

h. Emission Limitation:

Option A: VOC emissions shall not exceed 0.14 kg/liter (1.17 lbs/gallon) of coating solids.

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to d) and the performance testing required by f)(2) and f)(3).

[Authority for term: 40 CFR Part 60, Subpart TT]

OR

Option B: VOC emissions shall not exceed 10 percent of the VOC's applied for each calendar month (90 percent reduction).

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to sections d) and the performance testing required by f)(2) and f)(3).

[Authority for term: 40 CFR Part 60, Subpart TT]

i. Emission Limitation:

Option A: The permittee shall limit organic HAP emissions to no more than 0.046 kg/liter (0.38 lbs/gallon) of solids applied during each 12-month compliance period.

Applicable Compliance Method: Calculation of the organic HAP emitted during the month, for each calendar month, using Equation 8 of 40 CFR 63.5170 and the performance testing required by f)(2) and f)(3).

[Authority for term: 40 CFR Part 63, Subpart SSSS]

OR

Option B: The permittee shall limit organic HAP emissions to no more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction).

Applicable Compliance Method: Calculation of the overall organic HAP control efficiency, R, shall be achieved in accordance with 40 CFR 63.5170, Equation 7 and the performance testing required by f)(2) and f)(3).

[Authority for term: 40 CFR Part 60, Subpart SSSS]

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

a. Consistent with U.S. EPA streamlining policy, the permittee may elect upon approval of Ohio EPA to utilize the applicable performance test methods and procedures per 40 CFR Part 63, Subpart SSSS in lieu of the performance test methods and procedures contained in 40 CFR Part 60, Subpart TT. Subpart SSSS performance test methods and procedures are generally more stringent than the performance test methods and procedures of Subpart TT

b. The emission testing shall be conducted within 2 years from issuance of this permit

c. The test(s) shall be conducted while the emissions units are operating at or near the maximum capacities for collected emissions from emissions units K004 and K005, unless otherwise specified or approved by the Ohio EPA, Central District Office.

d. The permittee shall conduct a performance test for each capture and control system to determine the destruction or removal efficiency of each control device according to 40 CFR 63.5160(d) as described in section f)(2)h., and the capture efficiency of each capture system according to 40 CFR 63.5160(e) as described in f)(2)i, while burning natural gas in the curing ovens and collecting emissions from these emissions units (K004 and K005).

e. The permittee shall determine the organic HAP weight fraction of each coating material applied by following one of the following procedures:

i. thepermittee may determine the coating material organic HAP content in accordance with U.S. EPA Method 311 of appendix A of 40 CFR 63. U.S. EPA Method 311 determination may be performed by the manufacturer of the material and the results provided to the permittee. The organic HAP content shall be calculated according to the following criteria and procedures:

(a) count only those organic HAP that are measured to be present at greater than or equal to 0.1 weight percent for Occupational Safety and Health Administration (OSHA)-defined carcinogens as

specified in 29 CFR 1910.1200(d)(4) and greater than or equal to 1.0 weight percent for other organic HAP compounds;

(b) express the weight fraction of each organic HAP counted according to subparagraph (2). of this section as a value truncated to four places after the decimal point (for example, 0.3791); and

(c) calculate the total weight fraction of organic HAP in the tested material by summing the counted individual organic HAP weight fractions and truncating the result to three places after the decimal point (for example, 0.763).

ii. the permittee may determine the total volatile matter content of a coating as weight fraction of nonaqueous volatile matter and use it as a substitute for organic HAP, using U.S. EPA Method 24 of 40 CFR 60, appendix A. The U.S. EPA Method 24 determination may be performed by the manufacturer of the coating and the results provided to the permittee;

iii. thepermittee may use an alternative test method for determining the organic HAP weight fraction of a coating once the Administrator has approved it. The permittee shall follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval; and

iv. the permittee may use coating formulation data provided that the information represents each organic HAP present at a level equal to or greater than 0.1 percent for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and equal to or greater than 1.0 percent for other organic HAP compounds in any raw material used, weighted by the mass fraction of each raw material used in the material. Coating formulation data may be provided by the manufacturer of the coating material.

In the event of any inconsistency between test data obtained with the test methods specified in paragraphs (i) through (iii) of f)(2)e and formulation data, the test data will govern.

f. The permittee shall determine the VOC weight fraction of each coating material applied using U.S. EPA Method 24. For coatings, the permittee may determine the total volatile matter content as weight fraction of nonaqueous volatile matter using U.S. EPA Method 24 of 40 CFR 60, appendix A. The U.S. Method 24 determination may be performed by the manufacturer of the coating and the results provided to the permittee. Results of U.S. EPA Method 24 testing on water-borne coatings shall be adjusted as described in section 12.6 of U.S. EPA Method 24.

g. The permittee shall determine the solids content of each coating material applied. The permittee may determine the volume solids content using ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 (incorporated by reference, see 40 CFR 63.14), or an EPA approved alternative method. The ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 determination may be performed by the manufacturer of the material and the results provided to the permittee.

Alternatively, the permittee may rely on formulation data provided by material providers to determine the volume solids.

h. The permittee shall conduct a performance test to establish the destruction or removal efficiency of the control device or the outlet VOC concentration achieved by the oxidizer, according to the methods and procedures in U.S. EPA Methods 1 through 4 and 25 or 25A, 40 CFR Part 60, Appendix A or U.S. EPA Method 320, 40 CFR Part 63. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

i. The permittee shall determine the capture efficiency of the enclosure on the coating operation by one of the following procedures:

i. for an enclosure that meets the criteria for a PTE, the permittee may assume it achieves 100 percent capture efficiency. The permittee must confirm that the capture system is a PTE by demonstrating that it meets the requirements of section 6 of U.S. EPA Method 204 of 40 CFR 51, Appendix M (or a U.S. EPA-approved alternative method), and that all exhaust gases from the enclosure are delivered to a control device;

ii. thepermittee may determine capture efficiency (CE) according to the protocols for testing with temporary total enclosures that are specified in U.S. EPA Methods 204A through F of 40 CFR 51, Appendix M. The permittee may exclude never-controlled work stations from such capture efficiency determinations; and

iii. as an alternative to the procedures specified in paragraphs f)(2)i.i. and f)(2)i.ii., if a capture efficiency test is required, the permittee may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective or the Lower Confidence Limit approach as described in Appendix A to 40 CFR 63, Subpart KK. The permittee may exclude never-controlled work stations from such capture efficiency determinations.

During the performance test specified in paragraph f)(2)h of this section, the permittee shall monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. The permittee shall monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.

The permittee shall use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test.

This average combustion temperature is the minimum operating limit for the thermal oxidizer for purposes of 40 CFR Part 63, Subpart SSSS.

This average combustion temperature minus 50 degrees Fahrenheit is the minimum operating limit for the thermal oxidizer for purposes of 40 CFR Part 60, Subpart TT.

(3) 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, Central 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

g) Miscellaneous Requirements

(1) None.

2. K005, Finishing Coating Line

Operations, Property and/or Equipment Description:

Finishing Coating Line

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Volatile organic compound (VOC) emissions from the coating operation, including solvent cleanup activities shall not exceed 69.62 tons per rolling 12 month period.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) from the oven natural gas combustion shall not exceed 0.0075 pound per mmBtuand 0.59 ton per year. Nitrogen oxide (NO_x) emissions from the oven natural gas combustion shall not exceed 0.098 pound per mmBtuand 7.73 ton per year. Sulfur dioxide (SO_2) emissions from the oven natural gas combustion shall not exceed 0.0006 pound per mmBtuand 0.05 ton per year. Carbon monoxide (CO) emissions from the oven natural gas combustion shall not exceed 0.082 pound per mmBtuand 6.49 tons per year. Organic compound (OC) emissions from the oven natural gas combustion shall not exceed 4.0 pounds per mmBtuand 0.43 ton per year.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b(2)a.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b(2)b.
d.	OAC rule 3745-17-07(A)	Visible particulate emissions from thermal oxidizer stack shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).
e.	OAC rule 3745-21-09(E)	VOC emissions shall not exceed 4.0 lbs/gallon of solids when using the thermal oxidizer. See b)(2)d.
f.	40 CFR Part 60, Subpart TT (40 CFR 60.460 - 466) [In accordance with 40 CFR 60.460(a) and (b) this emissions unit is a metal coil coating line at an existing surface coating facility subject to the emissions limitations and control measures specified in this section]	Compliance Option A: VOC emissions shall not exceed 0.14 kg/liter (1.17 lbs/gal) of coating solids applied for each calendar month with the use of the thermal oxidizer or Compliance Option B: VOC emissions (stack and fugitive) shall not exceed 10 percent of the VOCs applied for each calendar month (90 percent reduction with the use of the thermal oxidizer). See b)(2)e and b)(2)h.
g.	40 CFR Part 63, Subpart SSSS (40 CFR 63.5080 - 5209) [In accordance with 40 CFR 63.5090(a), this emissions unit is a metal coil coating line at an existing surface coating facility subject to the emissions limitations and control measures specified in this section]	Compliance Option A: Organic HAP emissions shall not exceed 0.046 kg/liter (0.38 lbs/gallon) of solids applied during each rolling 12-month compliance period with the use of the thermal oxidizer. or Compliance Option B: Organic HAP emissions (stack and fugitive) shall not exceed 2 percent of the organic HAP applied during each rolling 12-month compliance period (98 percent reduction).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)f and b)(2)h
h.	40 CFR 63.1 - 16 (40 CFR 63.5140(b))	Table 2 to Subpart SSSS of 40 CFR Part 63 - Applicability of General Provisions to Subpart SSSS shows which parts of the General Provisions in 40 CFR 63.1 - 16 apply.
I	40 CFR 60.460 - 466	NSPS Subpart TT of 40 CFR Part 60references which parts of the General Provisions in 40 CFR 60.1 - 19 apply.
j.	OAC rule 3745-17-11(B)(1)	PE from the oven natural gas combustion shall not exceed 0.020 lb/mmBtu actual heat input.

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

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the OC, PE, NOX, SO2, and CO emissions from the oven natural gas combustion since the uncontrolled potential to emit for OC, PE, NOX, SO2 and CO is less than 10 tons/yr.

c. The permittee shall demonstrate compliance with the annual VOC emission limit on a 12-month rolling average basis. The annual limit, which is equivalent to 98 percent reduction based on the coating operations uncontrolled potential to emit, may be complied with through a combination of low-VOC content coatings and/or thermal incineration.

[Authority for Term: 40 CFR Part 63, Subpart SSSS.]

d. Pursuant to OAC rule 3745-21-09(B)(6), the 81 percent overall capture and control and 90 percent destruction efficiency option is available in lieu of

complying with the 4.0 lbs/gallon solids emission limitation contained in OAC rule 3745-21-09(E).

e. Compliance with the VOC emission limitations established pursuant to 40 CFR Part 60, Subpart TT shall be demonstrated on a calendar month basis using all coating materials applied in this emissions unit.

[Authority for Term: 40 CFR Part 60, Subpart TT.]

f. Compliance with the organic HAP emission limits established pursuant to 40 CFR Part 63, Subpart SSSS shall be demonstrated on a 12-month rolling average basis using all materials applied in this emissions unit or the permittee shall limit total organic HAP emissions, to no more than 2 percent of the HAP applied for each month during each 12-month compliance period (98 percent reduction).

[Authority for Term: 40 CFR Part 63, Subpart SSSS.]

g. The hourly and annual emission limitations from natural gas combustion in the coating process oven and thermal oxidizer were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

h. The permittee shall elect to use one of the following combinations of Compliance Options from 40 CFR Part 60, Subpart TT and 40 CFR Part 63, Subpart SSSS on a monthly basis:

i. Compliance Option A for 40 CFR Part 60, Subpart TT; along with either:

(a) Compliance Option A for 40 CFR Part 63, Subpart SSSS; or

(b) Compliance Option B for 40 CFR Part 63, Subpart SSSS.

ii. Compliance Option B for 40 CFR Part 60, Subpart TT; along with either:

(a) Compliance Option A for 40 CFR Part 63, Subpart SSSS; or

(b) Compliance Option B for 40 CFR Part 63, Subpart SSSS.

[Authority for Term: 40 CFR Part 60, Subpart TT and 40 CFR Part 63, Subpart SSSS].

c) Operational Restrictions

(1) See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080 - 5209)

(2) See 40 CFR Part 60, Subpart TT (40 CFR 60.460 - 466)

d) Monitoring and/or Recordkeeping Requirements

(1) See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080 - 5209) and Table I to 40 CFR Part 63, Subpart SSSS

(2) See 40 CFR Part 60, Subpart TT (40 CFR 60.460 - 466).

(3) The emission capture system shall be maintained under negative pressure whenever the emissions unit is in operation and all captured emissions shall be vented to the regenerative thermal oxidizer.

(4) For purposes of determining compliance with requirements in both OAC rules 3745-21-09(B)(3)(j) and (E), the permittee, when showing compliance with the VOC emissions limitation of 4.0 pounds per gallon of solids with the use of the thermal oxidizer, shall collect and record the following information for each day for emissions unit K005 and thermal oxidizer:

a. The name and identification of each coating, as applied;

b. The mass of VOC per gallon of coating solids, as applied and the solids content per gallon, as applied, and the volume, as applied, of each coating;

c. The maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;

d. The calculated controlled VOC emissions rate from coatings, in pounds of OC per gallon of coating solids, as applied;

e. The controlled VOC emissions rate from coatings shall be calculated using:

i. the overall control efficiency as determined during the most recent emissions test that demonstrated that the emissions unit was in compliance; and d)(4)e.ii. or d)(4)e.iii. below;

ii. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied); or

iii. the daily volume-weighted VOC per gallon of coating solids, as applied, recorded in d)(4)c.

f. A log or record of operating time for the capture system, control device, monitoring equipment, and associated emissions unit; and

g. 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 emissions test that demonstrated that the emissions unit was in compliance.

(5) For purposes of compliance with the requirements of OAC rule 3745-21-09(E) pursuant to OAC rule 3745-21-09(B)(6), the permittee shall collect and record the following information each day for the thermal oxidizer:

a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. 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 compliance test that demonstrated that the emissions unit was in compliance.

(6) The permittee shall collect and record the following information on a monthly basis:

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

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material, in fraction by weight;

d. the density of each VOC containing cleanup solvent used, in pounds per gallon;

e. the calculated, controlled VOC emission rate from all cleanup materials, in pounds or tons;

f. the total volume of solids from all the coatings employed, in gallons;

g. the total VOC emissions from all the coatings employed (i.e., the calculated, controlled VOC emission rate times the total volume of solids from all coatings employed in the line), in pounds or tons; and

h. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons.

e) Reporting Requirements

(1) See 40 CFR Part 63, Subpart SSSS (40 CFR 63.5080 - 5209)

(2) See 40 CFR Part 60, Subpart TT (40 CFR 60.460 - 466).

(3) The permittee shall notify Ohio EPA Central District Office in writing of any daily record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation. This notification shall include a copy of such record and shall be sent to Ohio EPA Central District Office no later than 45 days after the exceedance occurs.

(4) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. 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 emissions test that demonstrated that the emissions unit was in compliance.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(5) The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit. Annual emission reports may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

(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. Emissions Limitation: PE from oven natural gas combustion shall not exceed 0.0075 pound per mmBtuand 0.59 ton per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for total filterable PE in natural gas combustion (1.9lbs of PE /MM ft^3), and total condensable PE in natural gas combustion (5.7lbs of PE /MM ft^3).

The maximum capacity of the oven is 17600 ft^3/hr and 154,176,000 ft^3/yr.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and 202.

b. Emissions Limitation: NO_x emissions from the oven natural gas combustion shall not exceed 0.098 pound per mmBtuand 7.73 ton per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-1 (7/98) for uncontrolled NO_x in natural gas combustion (100 lbs of NOx/MMft^3).

The maximum capacity of the oven is 17600 ft^3/hr and 154,176,000 ft^3/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

c. Emission Limitation: SO_2 emissions from the oven natural gas combustion shall not exceed 0.0006 pound per mmBtuand 0.05 ton per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for SO_2 in natural gas combustion (0.6 lb of SO2/MMft^3).

The maximum capacity of the oven is 17600 ft^3/hr and 154,176,000 ft^3/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

d. Emission Limitation: CO emissions from the oven natural gas combustion shall not exceed 0.082 pound per mmBtuand 6.49 tons per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-1 (7/98) for CO in natural gas combustion (84 lbs of CO/MMft^3).

The maximum capacity of the oven is 17600 ft^3/hr and 154,176,000 ft^3/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

e. Emission Limitation: OC emissions from the oven natural gas combustion shall not exceed 4.0 pounds per mmBtuand 0.43 ton per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for volatile organic compounds (VOC) in natural gas combustion (5.5 lbs of VOC/MMft^3).

The maximum capacity of the oven is 17600 ft^3/hr and 154,176,000 ft^3/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

f. Emission Limitation: Visible particulate emissions from thermal incinerator stack shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

g. Emission Limitation: VOC emissions from the coating operation, including solvent cleanup activities, shall not exceed 69.62 tons per year.

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the sum total of VOC emissions from the coating operations and solvent cleanup activities. VOC emissions from coating operations are determined by summing the results of the 12 previous recent monthly calculations required pursuant to d) and multiplying the results of that summation by the overall VOC control efficiency, as determined by the most recent performance test that demonstrated that the emissions unit was in compliance.

h. Emission Limitation:

Option A: VOC emissions shall not exceed 0.14 kg/liter (1.17 lbs/gallon) of coating solids.

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to sections A.III and the performance testing required by section f)(2) and f)(3).

[Authority for term: 40 CFR Part 60, Subpart TT]

OR

Option B: VOC emissions shall not exceed 10 percent of the VOC's applied for each calendar month (90 percent reduction).

Applicable Compliance Method: Compliance with this emission limitation shall be based upon the records required pursuant to d) and the performance testing required by f)(2) and f)(3).

[Authority for term: 40 CFR Part 60, Subpart TT]

i. Emission Limitation:

Option A: The permittee shall limit organic HAP emissions to no more than 0.046 kg/liter (0.38 lbs/gallon) of solids applied during each 12-month compliance period.

Applicable Compliance Method: Calculation of the organic HAP emitted during the month, for each calendar month, using Equation 8 of 40 CFR 63.5170 and the performance testing required by f)(2) and f)(3).

[Authority for term: 40 CFR Part 63, Subpart SSSS]

OR

Option B: The permittee shall limit organic HAP emissions to no more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction).

Applicable Compliance Method:

Calculation of the overall organic HAP control efficiency, R, shall be achieved in accordance with 40 CFR 63.5170, Equation 7 and the performance testing required by f)(2) and f)(3).

[Authority for term: 40 CFR Part 60, Subpart SSSS]

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

a. Consistent with U.S. EPA streamlining policy, the permittee may elect upon approval of Ohio EPA to utilize the applicable performance test methods and procedures per 40 CFR Part 63, Subpart SSSS in lieu of the performance test methods and procedures contained in 40 CFR Part 60, Subpart TT. Subpart SSSS performance test methods and procedures are generally more stringent than the performance test methods and procedures of Subpart TT

b. The emission testing shall be conducted within 2 years from issuance of this permit

c. The test(s) shall be conducted while the emissions units are operating at or near the maximum capacities for collected emissions from emissions units K004 and K005, unless otherwise specified or approved by the Ohio EPA, Central District Office.

d. The permittee shall conduct a performance test for each capture and control system to determine the destruction or removal efficiency of each control device according to 40 CFR 63.5160(d) as described in f)(2)h., and the capture efficiency of each capture system according to 40 CFR 63.5160(e) as described in f)(2)i., while burning natural gas in the curing ovens and collecting emissions from these emissions units (K004 and K005).

e. The permittee shall determine the organic HAP weight fraction of each coating material applied by following one of the following procedures:

i. thepermittee may determine the coating material organic HAP content in accordance with U.S. EPA Method 311 of appendix A of 40 CFR 63. U.S. EPA Method 311 determination may be performed by the manufacturer of the material and the results provided to the permittee.. The organic HAP content shall be calculated according to the following criteria and procedures:

(a) count only those organic HAP that are measured to be present at greater than or equal to 0.1 weight percent for Occupational

Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and greater than or equal to 1.0 weight percent for other organic HAP compounds;

(b) express the weight fraction of each organic HAP counted according to subparagraph (2). of this section as a value truncated to four places after the decimal point (for example, 0.3791); and

(c) calculate the total weight fraction of organic HAP in the tested material by summing the counted individual organic HAP weight fractions and truncating the result to three places after the decimal point (for example, 0.763).

ii. the permittee may determine the total volatile matter content of a coating as weight fraction of nonaqueous volatile matter and use it as a substitute for organic HAP, using U.S. EPA Method 24 of 40 CFR 60, appendix A. The U.S. EPA Method 24 determination may be performed by the manufacturer of the coating and the results provided to the permittee;

iii. thepermittee may use an alternative test method for determining the organic HAP weight fraction of a coating once the Administrator has approved it. The permittee shall follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval; and

iv. the permittee may use coating formulation data provided that the information represents each organic HAP present at a level equal to or greater than 0.1 percent for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and equal to or greater than 1.0 percent for other organic HAP compounds in any raw material used, weighted by the mass fraction of each raw material used in the material. Coating formulation data may be provided by the manufacturer of the coating material.

In the event of any inconsistency between test data obtained with the test methods specified in f)(2)e.i. through f)(2)e.iii. and formulation data, the test data will govern.

f. The permittee shall determine the VOC weight fraction of each coating material applied using U.S. EPA Method 24. For coatings, the permittee may determine the total volatile matter content as weight fraction of nonaqueous volatile matter using U.S. EPA Method 24 of 40 CFR 60, appendix A. The U.S. Method 24 determination may be performed by the manufacturer of the coating and the results provided to the permittee. Results of U.S. EPA Method 24 testing on water-borne coatings shall be adjusted as described in section 12.6 of U.S. EPA Method 24.

g. The permittee shall determine the solids content of each coating material applied. The permittee may determine the volume solids content using ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 (incorporated by reference, see 40 CFR 63.14), or an EPA approved alternative method. The ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 determination may be performed by the manufacturer of the material and the results provided to the permittee.

Alternatively, the permittee may rely on formulation data provided by material providers to determine the volume solids.

h. The permittee shall conduct a performance test to establish the destruction or removal efficiency of the control device or the outlet VOC concentration achieved by the oxidizer, according to the methods and procedures in U.S. EPA Methods 1 through 4 and 25 or 25A, 40 CFR Part 60, Appendix A or U.S. EPA Method 320, 40 CFR Part 63. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

i. The permittee shall determine the capture efficiency of the enclosure on the coating operation by one of the following procedures:

i. for an enclosure that meets the criteria for a PTE, the permittee may assume it achieves 100 percent capture efficiency. The permittee must confirm that the capture system is a PTE by demonstrating that it meets the requirements of section 6 of U.S. EPA Method 204 of 40 CFR 51, Appendix M (or a U.S. EPA-approved alternative method), and that all exhaust gases from the enclosure are delivered to a control device;

ii. thepermittee may determine capture efficiency (CE) according to the protocols for testing with temporary total enclosures that are specified in U.S. EPA Methods 204A through F of 40 CFR 51, Appendix M. The permittee may exclude never-controlled work stations from such capture efficiency determinations; and

iii. as an alternative to the procedures specified in paragraphs (i)(i) and (ii) of this section, if a capture efficiency test is required, the permittee may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective or the Lower Confidence Limit approach as described in Appendix A to 40 CFR 63, Subpart KK. The permittee may exclude never-controlled work stations from such capture efficiency determinations.

During the performance test specified in f)(2)h, the permittee shall monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. The permittee shall monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.

The permittee shall use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test.

This average combustion temperature is the minimum operating limit for the thermal oxidizer for purposes of 40 CFR Part 63, Subpart SSSS.

This average combustion temperature minus 50 degrees Fahrenheit is the minimum operating limit for the thermal oxidizer for purposes of 40 CFR Part 60, Subpart TT.

(3) 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, Central 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

g) Miscellaneous Requirements

(1) None.

3. P010, P010

Operations, Property and/or Equipment Description:

Coil Preparation Line (Alkaline Spray Cleaning, Conversion Coating, Chromium Treatment Dryer, Cleaning Tank Burner)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissionsfrom natural gas combustion shall not exceed 0.0054 lb/mmBtu and 0.40 ton per year. Particulate emissions (PE) from natural gas combustion shall not exceed 0.13lb/hr and 0.55 ton per year. Nitrogen oxide (NO_x) emissions from natural gas combustion shall not exceed 0.049 lb/mmBtu and 7.26 tons per year. Sulfur dioxide (SO_2) emissions from natural gas combustion shall not exceed 0.0006 lb/mmBtu and0.04 ton per year. Carbon monoxide (CO) emissions from natural gas combustion shall not exceed 0.082 lb/mmBtu and 6.10 tons per year. PE from the coil preparation line shall not exceed 1.01 lb/hr and 5.61 tons per year. See b(2)a and c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b(2)b.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions from the Chromium Treatment Dryer Stack and the

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Cleaning Tank Burner Exhaust, each,shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).
d.	ORC 3704.03(F)	See b(2)d.
e.	OAC rule 3745-17-10(B)(1)	PE from the coil preparation line shall not exceed 0.020lb/mmBtu actual heat input.

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

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC, PE, NOX, SO2, and CO emissions from natural gas combustionfrom this air contaminant source since the uncontrolled potential to emit for VOC, PE, NOX, SO2 and CO is less than 10 tons/yr.

c. The hourly and annual emission limitations from natural gas combustion in the Chromium Treatment Dryer and the Cleaning Tank Burner were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

d. Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit-to-install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant

to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit-to-install.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

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.

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 Limitation: PE from natural gas combustion shall not exceed 0.13 lb/hr and 0.55 ton per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for total filterable PE in natural gas combustion (1.9lbs of PE /MM ft^3), and total condensable PE in natural gas combustion (5.7lbs of PE /MM ft^3).

The maximum capacity of the Chromium Treatment Dryer and the Cleaning Tank Burner is 165,600 ft^3/hr and 145,065,600 ft^3/yr.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and 202.

b. Emissions Limitation: NO_x emissions from natural gas combustion shall not exceed 0.049 lb/mmBtu and 7.26 tons per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-1 (7/98) for uncontrolled NO_x in natural gas combustion (100 lbs of NOx/MMft^3).

The maximum capacity of the Chromium Treatment Dryer and the Cleaning Tank Burner is 165,600 ft^3/hr and 145,065,600 ft^3/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

c. Emission Limitation: SO_2 emissions from natural gas combustion shall not exceed 0.0006 lb/mmBtu and0.04 ton per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for SO_2 in natural gas combustion (0.6 lb of SO2/MMft^3).

The maximum capacity of the Chromium Treatment Dryer and the Cleaning Tank Burner is 165,600 ft^3/hr and 145,065,600 ft^3/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

d. Emission Limitation: CO emissions from natural gas combustion shall not exceed 0.082 lb/mmBtu and 6.10 tons per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-1 (7/98) for CO in natural gas combustion (84 lbs of CO/MMft^3).

The maximum capacity of the Chromium Treatment Dryer and the Cleaning Tank Burner is 165,600 ft^3/hr and 145,065,600 ft^3/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

e. Emission Limitation: VOC emissions from natural gas combustion shall not exceed 0.0054 lb/mmBtu and 0.40 ton per year.

Applicable Compliance Method: Compliance with these emission limitations may be demonstrated by multiplying the maximum hourly and maximum annual natural gas burning capacity of the units by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for volatile organic compounds (VOC) in natural gas combustion (5.5 lbs of VOC/MMft^3).

The maximum capacity of the Chromium Treatment Dryer and the Cleaning Tank Burner is 165,600 ft^3/hr and 145,065,600 ft^3/yr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

f. Emission Limitation: Visible particulate emissions from thermal incinerator stack shall not exceed 20% opacity, as a 6-minute average, except as provided by OAC rule 3745-17-07(A).

Applicable Compliance Method: If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

g. Emission Limitation: PE from the coil preparation line shall not exceed 1.01 lb/hr and 5.61 tons per year.

Applicable Compliance Method: This emission limit is the potential to emit based on the Metal Finishing Facility Risk Screening Tool Emission Factors, tank surface area, and chemical concentrations.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and 202.

h. Emission Limitation: PE from the coil preparation line shall not exceed 0.020lb/mmBtu actual heat input.

Applicable Compliance Method:If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and 202.

g) Miscellaneous Requirements

(1) None.