



Environmental
Protection Agency

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

Certified Mail

11/14/2011

Mr. Dennis Bates
Skyline Steel, LLC
12355 State Route 7
Belpre, OH 45714

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

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

Facility ID: 0684010138
Permit Number: P0107462
Permit Type: OAC Chapter 3745-31 Modification
County: Washington

Dear Permit Holder:

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

Andrew Hall and Ohio EPA DAPC, Southeast District Office
Permit Review/Development Section 2195 Front Street
Ohio EPA, DAPC Logan, OH 43138
122 South Front Street
Columbus, Ohio 43215

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-SEDO; Pennsylvania; West Virginia



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

- 2. Source Description: Skyline Steel, LLC is located in Belpre, Ohio (Washington County). The permitted source (K001) includes four joined spray booths, each with an individual outlet and a maximum coating usage of 8.8 gallons/hour. The spray booths are combined, due to the spray booth manufacturer's restrictions of twenty foot length per booth and the facility's need to spray steel plates up to 80 feet in length. The facility currently has fabric filters installed on all four lines to control particulate matter.
- 3. Facility Emissions and Attainment Status: The facility is located in Belpre, Ohio (Washington County) which is in non-attainment for PM2.5. In addition, the area is an Appendix A area per OAC rule 3745-17-01 and therefore has additional restrictions on fugitive sources. K001 is the only permitted source located at the facility at this time.
- 4. Source Emissions: The permittee has requested a synthetic minor restriction per OAC rule 3745-31-05(D) in order to avoid Title V permitting and MACT (Subpart M) standard applicability. Without synthetic minor limitations the PTE for K001 would be 131.53 tons per year of volatile organic compounds.

The facility's has requested synthetic minor emission limitations of 99.0 TPY of VOC (rolling), 24.9 TPY of total hazardous air pollutants (HAP) (rolling), 9.9 TPY of a single HAP (rolling), and less than 10 TPY of particulate emissions.

- 5. Conclusion: The operational restrictions, emissions limitations, recordkeeping, and reporting requirements in this permit provide federally enforceable limits that are sufficient to limit the potential to emit below Title V and MACT thresholds.
- 6. Please provide additional notes or comments as necessary: None.
- 7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
VOC	99.0 (rolling)
Total HAP	24.9 (rolling)
Single HAP	9.9 (rolling)
PE	2.64

PUBLIC NOTICE

11/14/2011 Issuance of Draft Air Pollution Permit-To-Install and Operate

Skyline Steel, LLC

12355 State Route 7,

Belpre, OH 45714

Washington County

FACILITY DESC.: Rolled Steel Shape Manufacturing

PERMIT #: P0107462

PERMIT TYPE: OAC Chapter 3745-31 Modification

PERMIT DESC: Chapter 31 modification of PTI 06-08306, issued 2/21/08, to increase allowable emissions based on an increase in coating usage.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: epa.ohio.gov/dapc/permit by entering the permit # or: Cara Cherry, Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138. Ph: (740)385-8501

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Skyline Steel, LLC**

Facility ID:	0684010138
Permit Number:	P0107462
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	11/14/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Skyline Steel, LLC

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator?..... 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7
B. Facility-Wide Terms and Conditions..... 8
C. Emissions Unit Terms and Conditions 10
1. K001, Steel Coating Line 11



Authorization

Facility ID: 0684010138
 Application Number(s): A0040918
 Permit Number: P0107462
 Permit Description: Chapter 31 modification of PTI 06-08306, issued 2/21/08, to increase allowable emissions based on an increase in coating usage.
 Permit Type: OAC Chapter 3745-31 Modification
 Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*
 Issue Date: 11/14/2011
 Effective Date: To be entered upon final issuance
 Expiration Date: To be entered upon final issuance
 Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Skyline Steel, LLC
 12355 State Route 7
 Belpre, OH 45714

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

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

Ohio EPA DAPC, Southeast District Office
 2195 Front Street
 Logan, OH 43138
 (740)385-8501

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
 Director



Authorization (continued)

Permit Number: P0107462

Permit Description: Chapter 31 modification of PTI 06-08306, issued 2/21/08, to increase allowable emissions based on an increase in coating usage.

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

Emissions Unit ID:	K001
Company Equipment ID:	Steel Coating Line
Superseded Permit Number:	06-08306
General Permit Category and Type:	Not Applicable



A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Southeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

C. Emissions Unit Terms and Conditions



1. K001, Steel Coating Line

Operations, Property and/or Equipment Description:

Steel Coating Line containing four 20ft spray booths controlled with paper filter with 99% control efficiency. Chapter 31 modification of PTI 06-08306, issued 2/21/08, to increase allowable emissions.

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

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

a. g)(1).

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

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

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	<p>Volatile Organic Compounds (VOC) emissions shall not exceed 30.03 lbs/hour.</p> <p>Particulate Emissions (PE) shall not exceed 0.60lb/hour and 2.64 tons/year.</p> <p>There shall be no visible PE from the stacks serving this emission unit.</p> <p>See b)(2)a. below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1), OAC rule 3745-17-11(C), and OAC rule 3745-31-05(D).</p>
b.	OAC rule 3745-31-05(E), as effective 12/01/06	See b)(2)b. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V and MACT applicability)	VOC emissions from coating and cleanup, shall not exceed 99.0 tons per rolling, 12-month period. Total Hazardous Air Pollutants (HAPs) emissions from coating and cleanup, shall not exceed 24.9 tons per rolling, 12-month period. Single individual HAP emissions from coating and cleanup, shall not exceed 9.9 tons per rolling 12-month period. See c)(3) below.
d.	OAC rule 3745-21-09(U)(1)	VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.
e.	OAC rule 3745-17-11(C)	See c)(1)-(2) below.
f.	OAC rule 3745-17-07 (A)(1)	Exempt See b)(2)c. below.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions 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 revision 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 limits/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 SIP.

Permit to Install P0107462 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):



- i. The permittee shall operate the dry particulate filter system whenever this emissions unit is in operation. Per the permittee’s application, the dry particulate filter system shall have a capture efficiency of 100% and a control efficiency of 99%.
- ii. PE shall not exceed 2.64 tons/year.
- c. Pursuant to OAC rule 3745-17-07(A)(3)(h), the visible particulate emission (PE) limitations in OAC rule 3745-17-07(A)(1) do not apply to a source that is not subject to a mass emission limitation in OAC rule 3745-17-11.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer’s recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (3) The maximum coating and cleanup solvent usage for this emissions unit shall not cause VOC emissions to exceed 99.0 tons per rolling, 12-month period, calculated according to the following equations:

$$E_k = \sum_{n=1}^i [(C_i)(VOC_i)] \div 2,000$$

$$99.9 \text{ tons VOC per rolling, 12-month period} \geq \sum_{n=1}^k (E_k)$$

where:

E_k = monthly VOC emissions, in tons;

C_i = usage of each coating and cleanup solvent i , in gallons;

VOC_i = volatile organic compound content of each coating and cleanup solvent, in pounds per gallon; and

k = months in each rolling 12-month period

Potential emissions from de minimis and exempt sources at this facility are less than 1 ton of VOC per year, combined.

The permittee has existing records that are sufficient to demonstrate compliance with the rolling, 12-month emissions limitation upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance by means of a daily volume-weighted average VOC content, shall collect and record the following information each day for the coating line:

- a. the name and identification number of each coating and cleanup, as applied;
- b. the mass of VOC per volume of coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
- c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$, as follows:

$$(C_{VOC,2})_A = \frac{\sum_{i=1}^n C_{VOC,2i} L_{Ci} (V_{Si} + V_{VOCi})}{\sum_{i=1}^n L_{Ci} (V_{Si} + V_{VOCi})}$$

where:

$(C_{VOC,2})_A$ is the daily volume-weighted average VOC content of all coatings, as applied.

$C_{VOC,2i}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

D_C = density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

V_S = the volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period "t".

L_C = liquid volume of coating employed during time period "t", in gallons of coating.

M_C = mass of coating employed during the time period "t", in pounds of coating.

i = subscript denoting a specific coating employed during time period "t".

n = total number of coatings employed during time period "t".

t = time period specified for the weighted average VOC content is per day and not included in the calculation.

- (2) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in this emissions unit:
- a. The name and identification of each coating and cleanup material;
 - b. The number of gallons of coating and cleanup solvent employed;
 - c. The VOC content, as applied, in pounds per gallon for each coating and cleanup material;
 - d. The individual HAP content, for each HAP; in pounds per gallon;
 - e. The total HAP content, in pounds per gallon;
 - f. The monthly VOC emissions, in tons (calculated according to the equation in c)(3));
 - g. The monthly total HAP emissions from all coatings and cleanup materials employed [the sum of (b. x e.) for all coatings and for all cleanup materials] divided by 2,000, in tons;
 - h. The monthly individual HAP emissions from all coatings and cleanup materials employed [the sum of (b. x d.) for all coatings and for all cleanup materials] divided by 2,000, in tons;
 - i. the rolling, 12-month summation of the VOC emissions (calculated according to the equation in c)(3)); and
 - j. The rolling, 12-month summation of the individual and total HAP emissions.

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. all exceedances of the rolling, 12-month emissions limitation for VOC;
 - ii. all exceedances of the rolling, 12-month emissions limitation for total HAP; and
 - iii. all exceedances of the rolling, 12-month emissions limitation for single individual HAP.
- b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

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

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - (4) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.
- f) **Testing Requirements**
- (1) Compliance with the emissions limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emissions Limitation:**

VOC shall not exceed 30.03 lbs/hour.

Applicable Compliance Method:

If required, Volatile Organic compound emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary

Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

b. Emissions Limitation:

PE shall not exceed 0.60 lb/hour and 2.64 tons/year.

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$

Where E= PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.50); and

CE = fractional control efficiency of the control equipment (0.99).

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

c. Emissions Limitation:

There shall be no visible PE from the stack serving this emission unit.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 22.

d. Emissions Limitation:

VOC from coating and cleanup, shall not exceed 99.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1) and d)(2).

e. Emissions Limitation:

Total HAP emissions from coating and cleanup, shall not exceed 24.9 tons per rolling, 12-month period.

Applicable Compliance Method:

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

f. Emissions Limitation:

Single individual HAP emissions from coating and cleanup, shall not exceed 9.9 tons per rolling, 12-month period.

Applicable Compliance Method:

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

g. Emissions Limitation:

The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

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

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials.

g) Miscellaneous Requirements

- (1) 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 increased emissions between the permitted modifications of PTI 06-08306 issued February 21, 2008 and P0107462 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 FEPTIO 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 FEPTIO.