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

11/17/2011

Certified Mail

Facility ID: 0388010047
Permit Number: P0107664
County: Wyandot

Tate Tyson
Bridgestone APM Co.- AVD Plant
235 Commerce Way
Upper Sandusky, OH 43351

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Initial

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Daily Cheif-Union. A copy of the public notice, the Statement of Basis, 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
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

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 processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NWDO; Michigan

PUBLIC NOTICE
11/17/2011 Issuance of Draft Air Pollution Title V Permit

Bridgestone APM Co.- AVD Plant
235 Commerce Way,
Upper Sandusky, OH 43351
Wyandot County
FACILITY DESC.: Rubber Product Manufacturing for Mechanical Use
PERMIT #: P0107664
PERMIT TYPE: Initial
PERMIT DESC: Initial Title V operating permit for the production of bonded rubber to metal anti-vibration parts for the automotive industry.

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: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0388010047
Facility Name:	Bridgestone APM Co.- AVD Plant
Facility Description:	Bonded rubber to metal anti-vibration parts for the automotive industry
Facility Address:	235 Commerce Way, Upper Sandusky, OH 43351
Permit #:	P0107664, Initial

This facility is subject to Title V because it is major for:

☐ Lead ☐ Sulfur Dioxide ☐ Carbon Monoxide ☒ Volatile Organic Compounds ☐ Nitrogen Oxides
☒ Particulate Matter ≤ 10 microns ☐ Single Hazardous Air Pollutant ☒ Combined Hazardous Air Pollutants
☒ Maximum Available Control Technology Standard(s)

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC	N/A

rule 3745-77-08(E)	

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.1.			Lists facility wide terms and conditions that are enforceable under state law only.
B.2.		40 CFR Part 63, Subpart MMMM	States applicability of 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products), to emissions units K001, and K004 through K013. Also states applicability of general provisions (Subpart A).
B.3.	77-07(A)(13)		Lists insignificant emissions units that have one or more applicable requirements.

C. Emissions Unit Terms and Conditions

Key:
EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K001	1.0 lbs OC/hr		31-05(A)(3)	N	N	N	N	N	N	N	N	N	N	N	MR&Rp, & ET – The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no hourly recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation. *The potential to emit for this emissions unit was based on a maximum hourly gallon usage

															rate of 5 gallons per hour and a maximum OC content of 0.2 pounds per gallon.
K001	4.38 TPY OC		31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET – Compliance with the TPY emission limitation shall be based upon the recordkeeping requirements specified in section C.2 of this permit.
K001	3.0 lbs VOC/gallon, excluding water and exempt solvents	21-09(U)(1)(i)		N	N	Y	N	N	Y	N	Y	N	N	N	ET – Compliance shall be based upon the recordkeeping specified in section C.1 of this permit. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings.
N002	0.03 lb particulate emissions (PE)/hour; 0.13 ton PE/year		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR – The emissions unit shall be installed, operated, and maintained in accordance with the manufacturer's specifications. The permittee shall not change any of the manufacturer's factory preset parameters for the furnace, or physically modify the furnace in any way, without first verifying with the manufacturer that the change(s) would not adversely affect air contaminant emissions from the unit. The air contaminant control device for this emissions unit shall be designed and operated in accordance with the following requirements: a. the secondary combustion chamber shall be operated so that the exit gas temperature from the chamber is, at a minimum, 1400 degrees Fahrenheit, taking into account normal start-up procedures; and b. the secondary chamber shall allow for a minimum retention time of 0.5 seconds at 1400 degrees Fahrenheit, taking into account normal start-up procedures. The permittee shall adhere to the manufacturer's recommendations pertaining to the operation of this furnace and shall comply with the following operational restrictions: a. the permittee shall ensure that the furnace is operated only by properly trained personnel who have read, and understand, the furnace's operational manual; b. the permittee shall not operate the furnace if the built-in safeguards and interlocks (furnace excess temperature,

															afterburner excess temperature, low gas pressure switch, high gas pressure switch, and low water pressure switch) are not operating properly; and c. emissions unit N002 shall only be used for the purpose of removing non-hazardous material (such as paint, oil, plastic, grease, etc) from reusable metal parts. ET - The hourly emission limitation is based on manufacturer stack test data. If required, compliance with the particulate emission limitations shall be determined in accordance with the test method and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A. The annual emission limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.
N002	Visible PE shall not exceed 5% opacity except for 6 minutes in any continuous 60-minute period during which opacity shall not exceed 10%.		31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR – Same as N002 above. ET - If required, compliance shall be determined in accordance with the test method and procedures in Method 9 of 40 CFR Part 60, Appendix A.
N002	none	17-09(B)		Y	N	N	N	N	N	N	N	N	N	N	ND – The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
N002	none	17-07(A)		Y	N	N	N	N	N	N	N	N	N	N	ND – The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P001	3.29 tons PM10 /year;		31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET – The emission limitation was established in accordance with the baghouse manufacturer's maximum outlet concentration. If required, the

	0.01 grains PM10/dry standard cubic foot (dscf)														permittee shall demonstrate compliance by testing in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office. The ton per year emission limitation was developed by multiplying the emission limitation of 0.01 grains PM10/dscf by the maximum volumetric flow rate (8750 acfm), the maximum operating schedule of 8760 hours/year and applying the conversion factors of 60 minutes/hour, 2000 lbs/ton and 7000 grains/pound. Therefore, provided compliance is shown with the emission limitation of 0.01 grains PM10/dscf, compliance shall also be shown with the annual limitation.
P001	Visible particulate emissions shall not exceed 0% opacity as a six-minute average.		31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET – If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.
P001, P002, P003	none	17-11(B)		Y	N	N	N	N	N	N	N	N	N	N	ND – The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P001, P002, P003	none	17-07(A)		Y	N	N	N	N	N	N	N	N	N	N	ND – The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P002, P003	For emissions units P002 and P003: 0.01 grains PM10/dscf; For emissions units P002: 3.55 tons PM10/year; For emissions units P003: 1.58 tonsPM10/year		31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET – The emission limitation was established in accordance with the baghouse manufacturer's maximum outlet concentration. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office. The ton per year emission limitation was developed by multiplying the emission limitation of 0.01 grains PM10/dscf by the maximum volumetric flow rate from two baghouses controlling the emissions unit

															(8750 acfm& 700 acfm, respectively), the maximum operating schedule of 8760 hours/year and applying the conversion factors of 60 minutes/hour, 2000 lbs/ton and 7000 grains/pound. Therefore, provided compliance is shown with the emission limitation of 0.01 grains PM10/dscf, compliance shall also be shown with the annual limitation.
P002	0.31 lb OC/hr, 1.36 tons OC/year		31-05(A)(3)	N	N	N	N	N	N	N	N	N	N	N	M,R,Rp,ET – The hourly allowable OC emission limitation above represents the potential to emit for this emissions unit and was established by multiplying the maximum process weight rate of 1181 lbs/hr by appropriate emission factors from AP-42, Chapter 4.12-1 (June 1999) of 2.15E-04 lb OC/lb rubber and 5.15E-05 lb OC/lb rubber for mixing and extruding respectively.
P003	0.32 lb OC/hr; 1.40 tons OC/year		31-05(A)(3)	N	N	N	N	N	N	N	N	N	N	N	M,R,Rp,ET – The hourly allowable OC emission limitation above represents the potential to emit for this emissions unit and was established by multiplying the maximum process weight rate of 1181 lbs/hr by appropriate emission factors from AP-42, Chapter 4.12-1 (June 1999) of 2.15E-04 lb OC/lb rubber and 5.15E-05 lb OC/lb rubber for mixing and extruding respectively.
P002, P003	Visible particulate emissions shall not exceed 0% opacity as a six-minute average.		31-05(A)(3)	N	N	Y	N	N	Y	N	Y	N	N	N	ET – If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.
R003, R004	For R003 and R004 individually: 0.33 lb OC/hr; 1.45 tons OC/year from coating and cleanup operations		31-05(D)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE: a. These emissions units shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).
R003, R004, K004,	39.86 tons OC year from coating and		31-05(D)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR – The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements

K005, K006, K007, K008, K009, K010, K011, K012, K013	cleanup from emissions units K004-K013 and R003-R004 combined														which limit PTE: These emissions units shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture). ET – Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section d)(1) of this permit.
R003, R004, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013	none		31-05(A)(3), as effective 11/30/01	Y	N	N	N	N	N	N	N	N	N	N	ND – The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, 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 Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants 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 3745-31-05, the requirements of 3745-31-05(A)(3) as effective 12-1-06 will no longer apply. It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.
R003, R004, K004, K005, K006, K007, K008, K009, K010, K011, K012,	none		31-05(A)(3), as effective 12/01/06	Y	N	N	N	N	N	N	N	N	N	N	ND – 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. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the OC emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration federally

K013															enforceable requirements established under OAC rule 3745-31-05(D). The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 pounds PE per hour from each coating booth operation under OAC rule 3745-17-11(B).
R003, R004	none	21-07(M)		Y	N	N	N	N	N	N	N	N	N	N	ND – These emissions units meet the conditions contained in OAC rule 3745-21-07(M)(3)(c)(iii), which are more stringent than the requirements of OAC rule 3745-21-07(M)(2). Therefore, OAC rules 3745-21-07(M)(3)(a) and 3745-21-07(M)(3)(b) are not considered applicable.
R003, R004, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013	none	17-11(C)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR – 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. The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements. ET – Not applicable.
K004, K005	For K004 and K005 individually: 0.98 lb organic compounds (OC)/hr; 4.29 tons OC/year from coating and cleanup operations		31-05(D)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE: These emissions units shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).
K006	For K006: 0.72 lb OC/hour, 3.15		31-05(D)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements

	tons OC/year from coating and cleanup operations														which limit PTE: These emissions units shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).
K007, K008	For K007 and K008 individually: 1.14 lbs OC/hour, 4.99 tons OC/year from coating and cleanup operations		31-05(D)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE: These emissions units shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).
K009	For K009: 0.82 lb OC/hour, 3.59 tons OC/year from coating and cleanup operations		31-05(D)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE: These emissions units shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).
K010	For K010: 0.43 lb OC/hour, 1.88 tons OC/year from coating and cleanup operations		31-05(D)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE: These emissions units shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).
K011	For K011: 0.49 lb OC/hour, 2.15 tons OC/year from coating and cleanup operations		31-05(D)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE: These emissions units shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).

K012	For K012 individually: 0.92 lb organic compounds (OC)/hr; 4.03 tons OC/year from coating and cleanup operations		31-05(D)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE: These emissions units shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).
K013	For K013 individually: 0.49 lb organic compounds (OC)/hr; 2.15 tons OC/year from coating and cleanup operations		31-05(D)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE: These emissions units shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).
K004, K005, K006, K007, K008, K009, K010, K011, K012, K013	none	21-09(B)(6)		Y	N	N	N	N	N	N	N	N	N	N	ND – In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(D).
K004, K005, K006, K007, K008, K009, K010, K011, K012, K013	0.81 kg (6.8 lb) organic hazardous air pollutants (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period	40 CFR Part 63, Subpart MMMM (See 40 CFR Part 63.3880 et seq.) [In accordance with 40 CFR 63.3881, these emissions units are rubber-to-metal coating sources at an existing miscellaneous metal parts and products surface coating		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE: These emissions units shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).

		facility.]													
K004, K005, K006, K007, K008, K009, K010, K011, K012, K013	none	40 CFR 63.1-15 (40 CFR 63.3901)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR – The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE: These emissions units shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).
P001 P002															CAM was evaluated for these emissions. For PM10 emissions, it was determined these emissions units are 'other PSEU' and as such must comply with CAM upon on renewal of the Title V permit, per 64.5(b). There is no control for OC emissions.
P003															CAM was evaluated for these emissions. It was determined that the pre-control emissions from each controlled emissions unit is less than the major source threshold; and therefore is not subject to CAM requirements per 40 CFR 64.2 There is no control for OC emissions.
K001, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, R003, R004															CAM was evaluated for these emissions. It was determined that the pre-control emissions from each controlled emissions unit is less than the major source threshold; and therefore is not subject to CAM requirements per 40 CFR 64.2 and/or is subject to a MACT.

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Title V Permit
for
Bridgestone APM Co.- AVD Plant

Facility ID:	0388010047
Permit Number:	P0107664
Permit Type:	Initial
Issued:	11/17/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Bridgestone APM Co.- AVD Plant

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Authorization

Facility ID: 0388010047
Facility Description: Bonded rubber to metal anti-vibration parts for the automotive industry
Application Number(s): A0019094, A0019095, A0036804, A0039787, A0042777
Permit Number: P0107664
Permit Description: Initial Title V operating permit for the production of bonded rubber to metal anti-vibration parts for the automotive industry.
Permit Type: Initial
Issue Date: 11/17/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number:

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Bridgestone APM Co.- AVD Plant
235 Commerce Way
Upper Sandusky, OH 43351

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or

local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed

adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. 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, reopening 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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.

b) 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 paragraph (E) of OAC rule 3745-77-03.

(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.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. 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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

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. The following non-insignificant emissions units contained in this permit are subject to Maximum Achievable Control Technology (MACT) requirements under 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products):

EU ID	Operations, Property and/or Equipment Description
K004	Index coating line no. 1 vented to a regenerative thermal oxidizer
K005	Index coating line no.2 vented to a regenerative thermal oxidizer
K006	Robot coating operation vented to a thermal oxidizer
K007	Chain on edge coating line no.1 vented to a regenerative thermal oxidizer
K008	Chain on edge coating line no. 2 vented to a regenerative thermal oxidizer
K009	Robot coating line no.2 vented to a regenerative thermal oxidizer
K010	Roll coat line no.1 vented to regenerative thermal oxidizer
K011	Flange index bond line no.1 vented to a regenerative thermal oxidizer
K012	Tumble and spray bond line
K013	Flange index bond line no. 2 vented to a regenerative thermal oxidizer

The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart MMMM. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart MMMM. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart MMMM and Subpart A.

All the requirements of 40 CFR Part 63, Subpart MMMM, have been established in the Title V permit for this facility, which will encompass these emissions units upon reissuance. The applicable sections of 40 CFR Part 63, Subpart MMMM, have been cited in the appropriate sections for the non-insignificant emissions units (K004 through K013) subject to this rule. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

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

3. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirement contained in a permit-to-install; or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21; and/or in 40 CFR, Part 63, SubpartMMMM.

EU ID	Operations, Property and/or Equipment Description
B001	Miura Boiler
B002	Kewanee Boiler
P014	Chemlok Bulk Mixers

[Authority for term: OAC rule 3745-77-07(A)(13)]

C. Emissions Unit Terms and Conditions

1. K001, Water-Based Paint Line

Operations, Property and/or Equipment Description:

Waterborne paint line with preheat oven, two spray booths with filter pads and cure oven

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) d)(4) through d)(8).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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) (PTI #03-13356, issued 11-21-2000)	Emissions of organic compounds (OC) shall not exceed 1.0 pound per hour (lb/hr) and 4.38 tons per year (TPY). See b)(2)a. and b)(2)b.
b.	OAC rule 3745-21-09(U)(1)(i)	Emissions of volatile organic compounds (VOC) shall not exceed 3.0 pounds per gallon of coating, excluding water and exempt solvents.
c.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) has been determined to be the use of filter pads for control of particulate emissions and compliance with the terms and conditions of this permit.

b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(i).

c) Operational Restrictions

(1) Every individual coating used in this emissions unit, and all the thinners, additives, and cleaning/purge materials applied shall not contain any organic HAP. No organic HAP means no HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass. Organic HAP content shall be determined in accordance with 40 CFR 63.3941(a).

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63 Subpart MMMM]

(2) 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.

[Authority for term: OAC rule 3745-77-07(A)(1)]

(3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the miscellaneous metal parts coating operation(s), including at a minimum:

i. information from the supplier or manufacturer,

ii. formulation data and/or coating/material testing data,

iii. all data, documentation, and/or calculations needed to demonstrate that each coating, thinner, additive, and cleanup material applied in the miscellaneous metal parts coating operations contained no organic HAP*;

b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:

i. Method 311 from 40 CFR Part 63, Appendix A;

ii. Method 24 from 40 CFR Part 60, Appendix A if all non-aqueous volatile matter is to be used for the mass fraction of HAP;

iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the

mass of HAP per gallon of each material (pounds HAP/gallon of material ÷ pounds/gallon of material, or calculated in kg/liter); or

iv. solvent blends listed as single components and where neither test data nor manufacturer's data is available, default values from Table 3 to Subpart MMMM or Table 4 if not listed in Table 3, can be used.

In order to demonstrate continuous compliance with the requirement in c)(1) of this permit, each coating, thinner and/or other additive, and cleaning material used during the compliance period (each month) must contain no organic HAP. These records shall constitute a separate initial compliance demonstration for each coating applied. Each record shall be maintained for 5 years following the date of application of the coating.

* No organic HAP means no HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart MMMM]

(2) The permittee shall collect and record the following information each month for this emissions unit:

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

b. the VOC content of each coating, in pounds/gallon (excluding water and exempt solvents), as applied.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-13356]

(3) The permittee shall calculate and record the following information each month:

a. the name and identification of each coating employed;

b. the OC content of each coating, in pounds per gallon, as applied;

c. the number of gallons of each coating employed;

d. the total OC emissions from each coating employed, in pounds [d)(2)b. x d)(2)c.];

e. the total OC emissions from all coatings employed, in pounds [summation of d)(2)d.]; and

f. the annual, year-to-date OC emissions from all coatings employed [summation of d)(2)e. for each calendar month to date from January to December].

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-13356]

(4) Permit to install (PTI) #03-13356 allows for the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. The emission limitations specified in this permit was were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

a. Pollutant: 2-butoxyethanol

TLV (ug/m3): 121,000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 73.31

MAGLC (ug/m3): 2881

[Authority for term: PTI #03-13356]

(5) 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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

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

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

[Authority for term: PTI #03-13356]

(6) The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

[Authority for term: PTI #03-13356]

(7) For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by PTI 03-13356 or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit toinstall prior to the change.

[Authority for term: PTI #03-13356]

(8) The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

[Authority for term: PTI #03-13356]

(9) 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(10) 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(11) 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(12) 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(13) 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of a coating, thinner, additive, and/or cleaning/purge material was applied that contained organic HAP as defined in this permit. The report shall document the date and duration of the exceedance, as well as the mass average organic HAP content calculation for the compliance period during which the exceedance occurred.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart MMMM]

(2) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing the application of a coating with greater than 3.0 pounds VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of each such record and it shall be sent to the appropriate District Office or local air agency within 30 days following the end of the calendar month during which the non-compliant coating was applied.

[Authority for term: OAC rule 3745-77-07(C)(1); OAC rule 3745-21-09(B)(3)(g) and PTI #03-13356]

(3) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

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, April 30, July 31, and October 31, and shall cover the previous calendar quarters unless an alternative schedule has been established and approved by the Director (Ohio EPA, Northwest District Office).

[Authority for term: OAC rule 3745-77-07(C)(1)]

(4) 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.

[Authority for term: OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) Compliance with the emission limitation in Section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

Emissions of VOC shall not exceed 3.0 lbs per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping specified in d)(4) of this permit. Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-13356]

b. Emission Limitations:

Emissions of OC shall not exceed 1.0 lb/hr and 4.38 TPY from coating operations.

Applicable Compliance Method:

The hourly emission limitation is based on the emissions unit's potential to emit*. Therefore, no hourly recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation.

If required, compliance with the hourly OC emission limitation shall be based on the results of emissions testing conducted in accordance with Methods 1 – 4 and 18, 25, or 25A, as appropriate of 40 CFR Part 60, Appendix A.

Compliance with the annual emission limitation shall be based upon the recordkeeping requirements specified in d)(5) of this permit.

*The potential to emit for this emissions unit was based on a maximum hourly gallon usage rate of 5 gallons per hour and a maximum OC content of 0.2 pounds per gallon.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-13356]

g) Miscellaneous Requirements

(1) None.

2. N002, Burn-Off Oven

Operations, Property and/or Equipment Description:

Natural gas-fired pyrolysis furnace with afterburner

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 operations(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. 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) (PTI #03-17060, modification issued 11-15-2007)	Emissions of particulate matter (PE) shall not exceed 0.03 pound per hour and 0.13 ton per year. Opacity restriction [See b)(2)a.] Control requirements [See b)(2)b.]
b.	OAC rule 3745-17-09(B)	See b)(2)c
c.	OAC rule 3745-17-07(A)	See b)(2)c.

(2) Additional Terms and Conditions

a. Visible PE from this emissions unit shall not exceed 5% opacity, except for 6 minutes in any continuous 60-minute period during which opacity shall not exceed 10%.

b. Best Available Technology (BAT) control requirements for this emissions unit have been determined to be the use of natural gas and afterburner. BAT requirements also include compliance with the terms and conditions of this permit.

c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

c) Operational Restrictions

(1) The emissions unit shall be installed, operated, and maintained in accordance with the manufacturer's specifications. The permittee shall not change any of the manufacturer's factory preset parameters for the furnace, or physically modify the furnace in any way,

without first verifying with the manufacturer that the change(s) would not adversely affect air contaminant emissions from the unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #03-17060]

(2) The air contaminant control device for this emissions unit shall be designed and operated in accordance with the following requirements:

a. the secondary combustion chamber shall be operated so that the exit gas temperature from the chamber is, at a minimum, 1400 degrees Fahrenheit, taking into account normal start-up procedures; and

b. the secondary chamber shall allow for a minimum retention time of 0.5 seconds at 1400 degrees Fahrenheit, taking into account normal start-up procedures.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #03-17060]

(3) The permittee shall adhere to the manufacturer's recommendations pertaining to the operation of this furnace and shall comply with the following operational restrictions:

a. the permittee shall ensure that the furnace is operated only by properly trained personnel who have read, and understand, the furnace's operational manual;

b. the permittee shall not operate the furnace if the built-in safeguards and interlocks (furnace excess temperature, afterburner excess temperature, low gas pressure switch, high gas pressure switch, and low water pressure switch) are not operating properly; and

c. emissions unit N002 shall only be used for the purpose of removing non-hazardous material (such as paint, oil, plastic, grease, etc.) from reusable metal parts.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #03-17060]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall install, operate, and properly maintain a temperature gauge which monitors the temperature of the secondary combustion chamber. The permittee shall record the secondary combustion chamber temperature prior to each batch operation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-17060]

(2) The permittee shall maintain an operation/maintenance log for the emissions unit. The log, at a minimum, shall contain the following information:

a. the dates the emissions unit was operated;

b. the number of batches processed for each date the emissions unit was operated; and

c. the dates and descriptions of any additional maintenance activities performed on this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-17060]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that include the following information for each period during which the secondary chamber exhaust gas temperature fell below the applicable requirement:

a. the date of the excursion;

b. the temperature values during the excursion;

c. the cause(s) for the excursion; and

d. the corrective action which has been or will be taken to prevent similar excursions in the future.

These reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-17060]

(2) 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.

[Authority for term: OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) Compliance with the emission limitations in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitations</u>:

PE shall not exceed 0.03 lb/hr and 0.13 TPY.

<u>Applicable Compliance Method</u>:

The hourly emission limitation is based on manufacturer stack test data. If required, compliance with the particulate emission limitations shall be determined in accordance with the test method and procedures in Methods 1-5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly limitation by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-17060]

b. Emission Limitation:

Visible PE from this emissions unit shall not exceed 5% opacity, except for 6 minutes in any continuous 60-minute period during which opacity shall not exceed 10%.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with the test method and procedures in Method 9 of 40 CFR Part 60, Appendix A.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-17060]

g) Miscellaneous Requirements

(1) None.

3. P001, IRM: Carbon Black Delivery System

Operations, Property and/or Equipment Description:

Carbon Black Delivery System with baghouse

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 operations(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. 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) (PTI #03-17065, issued 02-28-2006)	Emissions of particulate matter equivalent to or less than 10 microns in size (PM10) shall not exceed 0.01 grains per dry standard cubic foot (dscf) and 3.29 tons per year. See b)(2)a. and b)(2)b. Visible particulate emissions (PE) shall not exceed 0% opacity, as a six-minute average.
b.	OAC rule 3745-17-11 (B)	See b)(2)c.
c.	OAC rule 3745-17-07 (A)	See b)(2)c.

(2) Additional Terms and Conditions

a. All emissions of particulate matter are PM10.

b. The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of a baghouse achieving a maximum outlet concentration of 0.01 grains PM10/dscf.

c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between ½inch to 4 inches.The listed pressure drop range applies at all times, except during periods of cleaning, new bag installations and other scheduled maintenance operations.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-17065]

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer''s recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the pressure drop readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into the Title V permit for the facility by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-17065]

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date)when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in e)(1)a. and/or e)(1)b.where a prompt investigation was not conducted;

d. each incident of deviation described in e)(1)a. and/or e)(1)b. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in e)(1)a. and/or e)(1)b. where proper records were not maintained for the investigation and/or the corrective action(s),as identified in the monitoring and record keeping requirements of this permit.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-17065]

(2) 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.

[Authority for term: OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitations:

Emissions of PM10 shall not exceed 0.01 grains/dscf and 3.29 TPY.

Applicable Compliance Method:

The emission limitation was established in accordance with the baghouse manufacturer's maximum outlet concentration.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

The ton per year emission limitation was developed by multiplying the emission limitation of 0.01 grains PM10/dscf by the maximum volumetric flow rate (8750 acfm), the maximum operating schedule of 8760 hours/year and applying the conversion factors of 60 minutes/hour, 2000 lbs/ton and 7000 grains/pound. Therefore, provided compliance is shown with the emission limitation of 0.01 grains PM10/dscf, compliance with the annual limitation shall also be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-17065]

b. Emission Limitation:

Visible PE shall not exceed 0% opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-17065]

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -Honda bondlines: R003, R004

EU ID	Operations, Property and/or Equipment Description
R003	Roll coat machine no.3 roll with regenerative thermal oxidizer
R004	Honda bondline no.4 vented to a regenerative thermal oxidizer

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) b)(1)f.; d)(9); d)(10); d)(11); d)(12) and e)(2)g.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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(D) (PTI #P0107521, issued 05/03/2011)	<u>For R003 and R004 individually</u>: Emissions of organic compounds (OC) shall not exceed 0.33 pound per hour (lb/hr) and 1.45 tons per year (TPY), from coating and cleanup operations. <u>For emissions unit K004 – K013, R003 and R004, combined:</u> Emissions of OC shall not exceed 39.86 TPY, from coating and cleanup operations. See b)(2)a., b)(2)b., and c)(1).
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI #P0107521, issued 05/03/2011)	See b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06 (PTI #P0107521, issued 05/03/2011)	See b)(2)d.
d.	OAC rule 3745-21-07(M)	See b)(2)e.
e.	OAC rule 3745-17-11(C)	c)(2) and c)(3).
f.	OAC rule 3745-114-01 ORC 3704.03(F)(4)(b)	See d)(9) through d)(12).

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE). The federally enforceable emission limitations are based on the operational restriction contained in c)(1) which requires control equipment:

i. 0.33 lb/hr and 1.45 TPY of OC emissions from coating and cleanup operations, and

ii. 39.86 TPY of OC from coating and cleanup from emissions units K004-K013 and R003-R004 combined.

b. A voluntarily request for a grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R003-R004, combined, to ease the monitoring and recordkeepingrequirements for these emissions units, which are controlled by the same regenerative thermal oxidizer.

c. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, 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 Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants 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 3745-31-05, the requirements of 3745-31-05(A)(3) as effective 12-1-06 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

d. This 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.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the OC emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(D).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the

federally enforceable rule limit of 0.551 pounds PE per hour from each coating booth operation under OAC rule 3745-17-11(B).

e. These emissions units meet the conditions contained in OAC rule 3745-21-07(M)(3)(c)(iii), which are more stringent than the requirements of OAC rule 3745-21-07(M)(2). Therefore, OAC rules 3745-21-07(M)(3)(a) and 3745-21-07(M)(3)(b) are not considered applicable.

c) Operational Restrictions

(1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:

a. Emissions units R003 and R004 shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0107521]

(2) 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0107521]

(3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0107521]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each coating and cleanup material employed each month for emissions units K004-K013 and R003-R004, combined:

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

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

c. the OC content of each coating and cleanup material employed, as applied, in pounds per gallon;

d. the total controlled OC emission rate for all the coatings and cleanup materials, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance {[summation of d)(1)b. x d)(1)c. (for all coatings and cleanup materials employed] x [1 - over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance]} ; and

e. the annual year-to-date organic compound emissions [sum of d)(1)d. for each month to date from January to December].

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(2) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) when the emissions unit is in operation. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee; and shall be capable of accurately measuring the temperature. The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained during the performance test that demonstrated compliance, or below the temperature recommended by the manufacturer until performance testing is completed; and

b. a log of the downtime for the capture (collection) system, thermal oxidizer, and/or monitoring equipment when the associated emissions unit was in operation.

These records shall be maintained at the facility for a period of three years.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(3) Whenever the monitored combustion temperature within the RTO deviates from the operating temperature value specified above, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment in conformance with the acceptable temperature value specified above, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the temperature readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The operating temperature requirement is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Northwest District Office. The permittee may request revisions to the permitted temperature value based upon information obtained during future emission tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the operating temperature value will not constitute a relaxation of the monitoring requirements and may be incorporated into this permit by means of minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(4) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(5) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(6) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(7) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(8) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(9) The permit-to-install application for these emissions unit(s), K004-K013, and R001-R004 was evaluated based on the actual materials and the design parameters of the emissions unit's(s’) exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw

materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the "American Conference of Governmental Industrial Hygienists" (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the "American Conference of Governmental Industrial Hygienists" (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: toluene

TLV (mg/m3): 188.4

Maximum Hourly Emission Rate (lbs/hr): 9.43

Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 287.3

MAGLC (ug/m3): 4486

The permittee, has demonstrated that emissions of toluene, from emissions unit(s) K004-K013, and R001-R004, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[Authority for term: PTI #P0107521]

(10) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can

affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[Authority for term: PTI #P0107521]

(11) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination

that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[Authority for term: PTI #P0107521]

(12) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[Authority for term: PTI #P0107521]

e) Reporting Requirements

(1) The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R003-R004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

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

a. each period of time (start time and date, and end time and date)when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;

c. each incident of deviation described in e)(2)a.or e)(2)b. where a prompt investigation was not conducted;

d. each incident of deviation described in e)(2)a.or e)(2)b. where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in e)(2)a.or e)(2)b. where proper records were not maintained for the investigation and/or the corrective action(s).;

f. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation; and

g. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level

concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.

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, April 30, July 31, and October 31, and shall cover the previous calendar quarters unless an alternative schedule has been established and approved by the Director (Ohio EPA, Northwest District Office).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

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

[Authority for term: OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for emissions unitsR003, R004, and K004 through K013 in accordance with the following requirements:

a. The emissions testing shall be conducted within 6 months after issuance of this permit, and every 2.5 years thereafter, unless otherwise approved by the Ohio EPA, Northwest District Office.

b. The emission testing shall be conducted in order to determine the capture efficiency of each emission capture system vented to the thermal oxidizer(s) and the destruction efficiency of the thermal oxidizer(s), both in percent. The current configuration of the control system involves a redundancy by having the ability to employ one of two available RTOs during operation. The permittee will be required to perform emission testing on any RTO which will be employed for purposes of complying with the requirements of this permit (i.e. if the permittee should elect to switch which RTO is employed then testing for each RTO individually must be conducted to demonstrate compliance).

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. Method 1 of 1A of Appendix A to 40 CFR Part 60, to select sampling sites and velocity traverse points;

ii. Method 2, 2A, 2C, 2D, 2F or 2G of Appendix A to 40 CFR Part 60, as appropriate, to measure gas volumetric flow rate;

iii. Method 3, 3A, or 3B of Appendix A to 40 CFR Part 60, as appropriate, for gas analysis to determine dry molecular weight;

iv. Method 4 of Appendix A to 40 CFR Part 60, to determine stack gas moisture;

v. Method 25 or 25A, to determine the total gaseous organic mass emissions as carbon at the inlet and outlet of the thermal oxidizer, simultaneously, using:

(a) Method 25 if testing an oxidizer with expected carbon concentrations to exceed 50 ppm

(b) Method 25A if testing an oxidizer with expected carbon concentrations to be 50 ppm or less, or if the control is not an oxidizer; and

Method 204 A through 204F (appropriate method) of Appendix M to 40 CFR Part 51 to determine the capture efficiency.

d. The test(s) shall be conducted while the emissions unitsare operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The total gaseous organic emissions mass flow rates shall be determined at the inlet and the outlet of the thermal oxidizer for each of the 3 test runs.

f. The total gaseous organic emissions mass flow rates shall be determined at the inlet and the outlet of the thermal oxidizer for each of the 3 test runs.

$M_f = Q_{sd}\ C_c\ (12)\ (0.0416)\ (10^{-6})$

where:

M_f is the total gaseous organic emissions mass flow rate, in kg/hr.

Q_{sd} is the volumetric flow rate of gases entering or exiting the thermal oxidizer, as determine by Method 2, 2A, 2C, 2D, 2F or 2G, in dscm/hour.

C_c is the concentration of organic compounds as carbon in the vent gas, as determined by Method 25 or 25A, in parts per million by volume on a dry basis (ppmv).

0.0416 is the conversion factor for molar volume, Kg-moles per cubic meter (mol/m^3) @ 293 degrees Kelvin and 760 mmHg.

g. For each test run the thermal oxidizer's organic emissions destruction efficiency shall be calculated as follows:

$DRE = [(M_{fi} - M_{fo}) / M_{fi}] \times 100$

where:

DRE is the organic emissions destruction efficiency of the thermal oxidizer, in percent.

M_{fi} is the total gaseous organic emissions mass flow rate at the inlet(s) to the thermal oxidizer, from the equation above, in kg/hour.

M_{fo} is the total gaseous organic emissions mass flow rate at the outlet(s) to the thermal oxidizer, from the equation above, in kg/hour.

The emission destruction or removal efficiency of the thermal oxidizer shall be the average of the efficiencies determined in the three test runs.

h. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

i. Personnel from the appropriate Ohio EPA District Office or local air agency 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.

j. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall conduct a performance test of each emission capture system when operating at a representative flow rate and when the thermal oxidizer is operating at a representative inlet concentration. The capture efficiency of each emission capture system shall be determined using one of the following methods. If the capture system does not meet the criteria for a permanent total enclosure in (a) below, the permittee shall determine the capture efficiency of each emissions capture system for the coating operations using either the “liquid-to-uncaptured-gas protocol” in (b) or the “gas-to-gas protocol” in (c) below:

a. The capture system efficiency can be assumed to be 100% if both of the following conditions are met:

i. the capture system meets the criteria in Method 204 found in 40 CFR Part 51, Appendix M for a permanent total enclosure and all the exhaust gases from the enclosure are directed to the thermal oxidizer.

ii. all coatings, thinners and or other additives, and cleaning materials used in the coating operation are applied within the capture system; coating

solvent flash-off, curing, and drying occurs within the capture system; and the removal or evaporation of cleaning materials from the surfaces they are applied to occurs within the capture system.

b. The liquid-to-uncaptured-gas protocol compares the mass of liquid total volatile hydrocarbon (TVH) in materials used in the coating operation to the mass of TVH emissions not captured by the emission capture system. To measure the emission capture system efficiency using the liquid-to uncaptured gas protocol the following procedures shall be followed:

i. The coating operations must be enclosed either by using the building enclosure or by constructing an enclosure around all operations where coatings, thinners and/or other additives, and cleaning materials are applied and any areas following the application where emissions from these applied coatings and thinners/additives and cleaning materials subsequently occur (flash-off, curing, and drying areas). Areas where capture devices collect emissions for routing to the thermal oxidizer, such as the entrance and exit areas of an oven or spray booth must also be inside the enclosure. The enclosure must meet the definition of a temporary total enclosure or building enclosure in Method 204 found in 40 CFR Part 51, Appendix M.

ii. Method 204A or 204F in 40 CFR Part 51, Appendix M shall be used to determine the mass fraction of TVH liquid input from each coating, thinner and/or other additive, and cleaning material used in the coating operation during each capture efficiency test run. Substitute TVH for each occurrence of the term volatile organic compounds (VOC) in the methods. Each test run must be at least 3 hours in duration or the length of a production run, whichever is longer, up to 8 hours.

iii. Calculate the total mass of TVH liquid input from all coatings, thinners and/or additives, and cleaning materials used in the coating operation during each capture efficiency test run as follows:

$$TVH_{used} = \sum_{i=1}^{n} (TVH_i)(VOL_i)(D_i)$$

where:

TVH_{used} is the mass of liquid TVH in the materials used in the coating operation during the capture efficiency test run, in kg or pound.

TVH_i is the mass fraction of TVH in coating, thinner and/or other additive, or cleaning material “i” that is used in the coating operation during the capture efficiency test run, in kg of TVH per kg material or pound of TVH per pound material.

VOL_i is the total volume of coating, thinner and/or other additive, or cleaning material "i" used in the coating operation during the capture efficiency test run, in liters or gallons.

D_i is the density of coating, thinner and/or other additive, or cleaning material "i" used in the coating operation during the capture efficiency test run, in kg of material per liter of material or pound of material per gallon of material.

n is the number of different coatings, thinners and/or other additives, or cleaning materials used in the coating operation during the capture efficiency test run.

iv. Method 204D for a temporary total enclosure or 204E for a building enclosure, both in 40 CFR Part 51, Appendix M, shall be used to measure the total mass, kg or pound, of TVH emissions that are not captured by the emission capture system, as they exit the temporary total enclosure or building enclosure during each capture efficiency test run. Substitute TVH for each occurrence of the term volatile organic compounds (VOC) in the methods. Each test run must be at least 3 hours in duration or the length of a production run, whichever is longer, up to 8 hours. If using the building as the enclosure, all organic compound emitting operations inside the building enclosure, other than the coating operation for which the capture efficiency is being determined must be shut down, with all fans and blowers operating normally.

v. Use the following equation to determine the percent capture efficiency of the emission capture system for each capture efficiency test run:

$$CE = [(TVH_{used} - TVH_{uncaptured}) / TVH_{used}] \times 100$$

CE is the capture efficiency of the emission capture system vented to the thermal oxidizer, in percent.

TVH_{used} is the total mass of TVH liquid input used in the coating operation during the capture efficiency test run, in kg or pound.

$TVH_{uncaptured}$ is the total mass of TVH that is not captured by the emission capture system and that exits from the temporary total enclosure or building enclosure during the capture efficiency test run, in kg or pound.

vi. The capture efficiency of the emission capture system shall be calculated as the average of the capture efficiencies measured in the three test runs.

c. The gas-to-gas protocol compares the mass of TVH emissions captured by the emission capture system to the mass of TVH emissions not captured. To measure the emission capture system efficiency using the gas-to-gas protocol the following procedures shall be followed:

i. The coating operations must be enclosed either by using the building enclosure or by constructing an enclosure around all operations where

coatings, thinners and/or other additives, and cleaning materials are applied and any areas following the application where emissions from these applied coatings and thinners/additives and/or cleaning materials subsequently occur (flash-off, curing, and drying areas). Areas where capture devices collect emissions for routing to the thermal oxidizer, such as the entrance and exit areas of an oven or spray booth must also be inside the enclosure. The enclosure must meet the definition of a temporary total enclosure or building enclosure in Method 204 found in 40 CFR Part 51, Appendix M.

ii. Method 204B or 204C in 40 CFR Part 51, Appendix M shall be used to measure the total mass, in kg or pound, of TVH emissions captured by the emission capture system during each capture efficiency test run, as measured at the inlet to the thermal oxidizer. Substitute TVH for each occurrence of the term volatile organic compounds (VOC) in the methods. Each test run must be at least 3 hours in duration or the length of a production run, whichever is longer, up to 8 hours. The sampling points must be upstream from the thermal oxidizer and must represent total emissions routed from the capture system and entering the thermal oxidizer. If multiple emission streams from the capture system enter the thermal oxidizer without a single common duct, then the emissions entering the thermal oxidizer must be simultaneously measured in each duct and the total emissions entering the thermal oxidizer must be determined.

iii. Method 204D for a temporary total enclosure or 204E for a building enclosure, both in 40 CFR Part 51, Appendix M, shall be used to measure the total mass, kg or pound, of TVH emissions that are not captured by the emission capture system, as they exit the temporary total enclosure or building enclosure during each capture efficiency test run. Substitute TVH for each occurrence of the term volatile organic compounds (VOC) in the methods. Each test run must be at least 3 hours in duration or the length of a production run, whichever is longer, up to 8 hours. If using the building as the enclosure, all organic compound emitting operations inside the building enclosure, other than the coating operation for which the capture efficiency is being determined must be shut down, with all fans and blowers operating normally.

iv. Use the following equation to determine the percent capture efficiency of the emission capture system for each capture efficiency test run:

$$CE = [(TVH_{captured}) / (TVH_{captured} + TVH_{uncaptured})] \times 100$$

CE is the capture efficiency of the emission capture system vented to the thermal oxidizer, in percent.

$TVH_{captured}$ is the total mass of TVH captured by the emission capture system as measured at the inlet to the thermal oxidizer during the emission capture efficiency test run, in kg or pound.

$TVH_{uncaptured}$ is the total mass of TVH that is not captured by the emission capture system and that exits from the temporary total enclosure or building enclosure during the capture efficiency test run, in kg or pound.

v. The capture efficiency of the emission capture system shall be calculated as the average of the capture efficiencies measured in the three test runs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) Compliance with the emission limitation in Section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitations:

Emissions units R003 and R004 shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).

Applicable Compliance Method:
Compliance shall be demonstrated based on the results of the emissions testing requirements in f)(1) and f)(2) above.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

b. Emission Limitations:

Emissions of OC shall not exceed 0.33 lb/hr and 1.45 TPY from R003 and R004, individually

Applicable Compliance Method:
The hourly emission limitation represents each emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (0.9 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

If required, compliance with the hourly OC emission limitation shall be based on the results of emissions testing conducted in accordance with Methods 1 – 4 and 18, 25, or 25A, as appropriate of 40 CFR Part 60, Appendix A.

The annual emissionlimitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the destruction and capture efficiency limitations, compliance with the hourly and annual limitations shall also be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

c. Emission Limitation:

Emissions of OC shall not exceed 39.86 TPY, from coating and cleanup operations from K004-K013 and R003-R004, combined.

Applicable Compliance Method:
Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section d)(1) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -IRM: Rubber Manufacturing: P002, P003

EU ID	Operations, Property and/or Equipment Description
P002	Banbury Operations consisting of minor ingredients A weighing station, mixer feed A, skip hoist A, a sheet pre-forming machine and cantelever batch-off A, with baghouse
P003	Kneader Operations consisting of minor ingredients B weighing station, mixer feed B, skip hoist B, a sheet pre-forming machine and a cantilever batch-off B, with a baghouse

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) d)(4).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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) (PTI #03-17065, issued 02-28-2006)	<u>For emissions unit P002</u>: Emissions of particulate matter equivalent to or less than 10 microns in size (PM10) shall not exceed 3.55 tons per year (TPY). Emissions of organic compounds (OC) shall not exceed 0.31 pound per hour (lb/hr) and 1.36 TPY. <u>For emissions unit P003</u>: Emissions of PM10 shall not exceed 1.58 TPY. Emissions of OC shall not exceed 0.32 lb/hr and 1.40 TPY. <u>For emissions units P002 and P003</u>: Emissions of PM10 shall not exceed 0.01 grains per dry standard cubic foot (dscf). Visible particulate emissions (PE) shall not exceed 0% opacity as a six-minute average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a., b)(2)b. and b)(2)c.
b.	OAC rule 3745-17-11(B)	See b)(2)d.
c.	OAC rule 3745-17-07(A)	See b)(2)d.

(2) Additional Terms and Conditions

a. All emissions of particulate matter are PM10.

b. The hourly OC emission limitations were established to represent the emission unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements are necessary to ensure compliance with these emission limitations.

c. The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of a baghouse achieving a maximum outlet concentration of 0.01 grains PM10/dscf.

d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between ½inch to 4 inches. The listed pressure drop range applies at all times, except during periods of cleaning, new bag installations and other scheduled maintenance operations.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-17065]

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer''s recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the pressure drop readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into the Title V permit for the facility by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-17065]

(3) Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

[PTI #03-17065]

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date)when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in b)(1)a. (above) where a prompt investigation was not conducted;

d. each incident of deviation described in b)(1)a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in b)(1)a. where proper records were not maintained for the investigation and/or the corrective action(s),as identified in the monitoring and record keeping requirements of this permit.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-17065]

(2) 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.

[Authority for term: OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) Compliance with the emission limitation in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:

Emissions of PM10 shall not exceed 0.01 grains/dscf.

<u>Applicable Compliance Method</u>:

The emission limitation was established in accordance with the baghouse manufacturer's maximum outlet concentration.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-17065]

b. Emission Limitations:

Emissions of PM10 shall not exceed 3.55 TPY(for emissions unit P002) and 1.58 TPY(for emissions unit P003).

Applicable Compliance Method:

The annual emission limitations were developed by multiplying the emission limitation of 0.01 grain PM10/dscf by the maximum volumetric flow rate from two baghouses controlling these emissions units (8750 acfm & 700 acfm, respectively), the maximum operating schedule of 8760 hours/year and applying the conversion factors of 60 minutes/hour, 2000 lbs/ton and 7000 grains/pound. Therefore, provided compliance is shown with the emission limitation of 0.01 grains PM10/dscf, compliance with the annual emission limitations shall also be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-17065]

c. Emission Limitations:

Emissions of OC shall not exceed 0.31 lb/hr and 1.36 TPY for P002.

Applicable Compliance Method:

The hourly emission limitation above represents the potential to emit for this emissions unit and was established by multiplying the maximum process weight rate of 1181 lbs/hr by appropriate emission factors from AP-42, Chapter 4.12-1 (June 1999) of 2.15E-04 lb OC/lb rubber and 5.15E-05 lb OC/lb rubber for mixing and extruding respectively.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, and/or 25A as applicable.

The annual allowable OC emission above represents the potential to emit for this emissions unit and was established by multiplying the potential hourly emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-17065]

d. Emission Limitations:

Emissions of OC shall not exceed 0.32 lb/hr and 1.40 TPY for P003.

Applicable Compliance Method:

The hourly allowable OC emission limitation above represents the potential to emit for this emissions unit and was established by multiplying the maximum process weight rate of 1181 lbs/hr by appropriate emission factors from AP-42, Chapter 4.12-1 (June 1999) of 2.15E-04 lb OC/lb rubber and 5.15E-05 lb OC/lb rubber for mixing and extruding respectively.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, and/or 25A as applicable.

The annual allowable OC emission above represents the potential to emit for this emissions unit and was established by multiplying the potential hourly emissions by a maximum annual operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-17065]

e. Emission Limitation:

Visible PEshall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #03-17065]

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group -MACTCoating Lines (Group A): K004, K005, K006, K007, K008, K009, K010, K011,

EU ID	Operations, Property and/or Equipment Description
K004	Index coating line no. 1 vented to a regenerative thermal oxidizer
K005	Index coating line no.2 vented to a regenerative thermal oxidizer
K006	Robot coating operation vented to a thermal oxidizer
K007	Chain on edge coating line no.1 vented to a regenerative thermal oxidizer
K008	Chain on edge coating line no. 2 vented to a regenerative thermal oxidizer
K009	Robot coating line no.2 vented to a regenerative thermal oxidizer
K010	Roll coat line no.1 vented to regenerative thermal oxidizer
K011	Flange index bond line no.1 vented to a regenerative thermal oxidizer

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) b)(1)f.; d)(16); d)(17); d)(18); d)(19); and e)(10)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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(D) (PTI #P0107521, issued 05-03-2011)	<u>For K004 and K005 individually</u>: Emissions of organic compounds (OC) shall not exceed 0.98 pound per hour (lb/hr) and 4.29 tons per year (TPY) from coating and cleanup operations. <u>For K006</u>: Emissions of OC shall not exceed 0.72 lb/hr and 3.15 TPY from coating and cleanup operations. <u>For K007 and K008 individually</u>: Emissions of OC shall not exceed 1.14 lbs/hr and 4.99 TPY from coating and cleanup operations. <u>For K009</u>: Emissions of OC shall not exceed 0.82 lb/hr and 3.59 TPY from coating and cleanup operations.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		For K010: Emissions of OC shall not exceed 0.43 lb/hr and 1.88 TPY from coating and cleanup operations. For K011: Emissions of OC shall not exceed 0.49 lb/hr and 2.15 TPY from coating and cleanup operations. Emissions of OC shall not exceed 39.86 TPY from coating and cleanup from emissions units K004-K013 and R003-R004 combined. See b)(2)a., b)(2)b. and c)(1)
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI #P0107521, issued 05-03-2011)	See b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06 (PTI #P0107521, issued 05-03-2011)	See b)(2)d.
d.	OAC rule 3745-21-09(B)(6)	See b)(2)e.
e.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).
f.	OAC rule 3745-114-01 ORC 3704.03(F)(4)(b)	See d)(15) through d)(18).
g.	40 CFR Part 63, Subpart MMMM (See 40 CFR 63.3880 et seq.) [In accordance with 40 CFR 63.3881, these emissions unitsare rubber-to-metal coating sources at a miscellaneous metal parts and products surface coating facility.]* *The company has chosen to comply with the emissions limitation for new or reconstructed rubber-to-metal coating sources only, since over half of these emissions units were installed after August 13, 2002, and all are controlled by one of two RTOs. (See 40 CFR 63.3882(c), (d), and (e), and 40 CFR 63.2.	63.3890(a)(4): Emissions of organic hazardous air pollutants (HAP) shall not exceed 0.81 kg (6.8 lb) per liter (gal) coating solids used during each 12-month compliance period. See Section B.2. – FACILITY – WIDE TERMS AND CONDITIONS See b)(2)f. through b)(2)j.
h.	40 CFR 63.1-15	Table 2 to Subpart MMMM of 40 CFR

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(40 CFR 63.3901)	Part 63- Applicability to Subpart MMMM shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE). The federally enforceable emission limitations are based on the operational restriction contained in c)(1) which requires control equipment:

i. 0.98 lb/hr and 4.29 TPY of OC, from coating and cleanup operations for emissions units K004 and K005, individually;

ii. 0.72 lb/hr and 3.15 TPY of OC, from coating and cleanup operations for emissions unit K006;

iii. 1.14 lbs/hr and 4.99 TPY of OC, from coating and cleanup operations for emissions units K007 and K008;

iv. 0.82 lb/hr and 3.59 TPY of OC, from coating and cleanup operations for emissions unit K009;

v. 0.43 lb/hr and 1.88 TPY of OC, from coating and cleanup operations for emissions unit K010;

vi. 0.49 lb/hr and 2.15 TPY of OC,from coating and cleanup operations for emissions unit K011; and

vii. 39.86 TPY of OC from coating and cleanup from emissions units K004-K013 and R003-R004 combined.

The permittee has committed to reclaim 100% of all cleanup material used resulting in no emissions from cleanup operations [see c)(3)]. Cleanup solvents are only used in the enclosed booths when coating operations have been discontinued. The cleanup operation is a closed loop system using covered paint pots and covered pails to recover the used solvents.

b. A voluntarily request for a grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R003-R004, combined, to ease the monitoring and recordkeepingrequirements for these emissions units.

c. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, 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 Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate

Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants 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 3745-31-05, the requirements of 3745-31-05(A)(3) as effective 12-1-06 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

d. This 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.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the OC emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(D).

e. In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(D).

f. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

The final rules found in 40 CFR Part 63, Subpart MMMM establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for miscellaneous metal parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of miscellaneous metal parts and products:

i. all coating operations as defined in 40 CFR 63.3981;

ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee is subject to this NESHAP in accordance with the compliance date specified in 40 CFR 63.3883.

g. The coating operation(s) shall comply with the applicable emission limitation(s) in 40 CFR 63.3890 and the operating limits for the thermal oxidizer (add-on control device) and emission capture system(s) as required by 40 CFR 63.3892 at all times except during periods of startup, shutdown, and malfunction; and the coating operation(s) shall be operated in compliance with the work practice standards in 40 CFR 63.3893 at all times.

h. The permittee shall conduct a performance test according to 40 CFR sections 63.3964, 63.3965, and 63.3966 for each capture system and the thermal oxidizer; and shall establish the operating limits required by 40 CFR 63.3892 and as required by 40 CFR 63.3967 no later than 180 days after the compliance date specified in b)(2)f. above.

i. The permittee shall develop and implement a written startup, shutdown, and malfunction plan (SSMP) by the compliance date of the NESHAP and according to the provisions found in 40 CFR 63.6(e)(3), as follows:

i. The written startup, shutdown, and malfunction plan (SSMP) shall describe, in detail, procedures for operating and maintaining the emissions unit(s) during periods of startup, shutdown, and malfunction.

ii. The plan shall document detailed procedures of corrective action for the malfunction of the process source, the air pollution control equipment, and the monitoring equipment (including CMSs), used to comply with the requirements of this permit and the NESHAP.

iii. The SSMP does not need to address any scenario that would not cause the emissions unit(s) to exceed an applicable emission limitation in the NESHAP.

iv. The SSMP shall address any coating operation equipment that might cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.

v. The SSMP shall be written for the following purpose:

(a) to ensure that, at all times, each emissions unit, including the associated air pollution control equipment and monitoring equipment, is maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions;

(b) to ensure that operators are prepared to correct malfunctions as soon as practicable after their occurrence, in order to minimize excess emissions of hazardous air pollutants;

(c) to reduce the reporting burden associated with periods of startup, shutdown, and malfunction; and

(d) to document corrective actions and operating procedures to be taken to restore malfunctioning processes and air pollution control equipment to its normal or usual manner of operation.

vi. The plan shall provide a means to maintain a record of actions (including those conducted to correct a malfunction) taken by the operator during any startup, shutdown, or malfunction event where the emissions unit exceeded an applicable emission limitation, and where actions are consistent with the procedures specified in the SSMP. These records may take the form of a "checklist," or other effective form of record keeping, that confirms conformance with the SSMP and describes the actions taken during each startup, shutdown, and/or malfunction event. The plan (and checklist, if used) can then be modified to correct or change any sequence of actions and/or equipment settings to help prevent future exceedances of the same limitation for the same reason.

vii. If an/the action(s) taken by the operator during a startup, shutdown, or malfunction event is/are not consistent with the procedures specified in the emissions unit's SSMP, and the unit's emissions exceed an applicable emission limitation in the relevant standard (NESHAP), the plan shall require the operator to record the actions taken during each such an event, and shall require the permittee to report (via phone call or FAX) the exceedance and its cause (actions taken) to the regulating agency within 2 working days following the actions conducted that were inconsistent with the plan. The plan shall also require that this notification be followed by a letter, within 7 working days after the end of the event, in accordance with the reporting requirements of this permit (from 40 CFR 63.10(d)(5)(ii)), unless the permittee makes alternative reporting arrangements, in advance, with the Director.

viii. The permittee may use the standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) plan or other similar document to satisfy the requirements for a SSMP, provided the alternative plans meet all the requirements of the permit and the NESHAP, and the document is available for inspection or is submitted when requested by the Director.

ix. The Director shall require appropriate revisions to the SSMP, if the plan contains one of the following inadequacies:

(a) does not address a startup, shutdown, or malfunction event that has occurred;

(b) fails to provide for the operation of the emissions unit (including associated air pollution control and monitoring equipment) during a startup, shutdown, or malfunction event in a manner consistent with the general duty to minimize emissions;

(c) does not provide adequate procedures for correcting malfunctioning processes and/or air pollution control and monitoring equipment as quickly as practicable; or

(d) includes an event that does not meet the definition of startup, shutdown, or malfunction in 40 CFR 63.2.

63.2 definitions:

Malfunction: means any sudden, infrequent, and not reasonably preventable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner which causes, or has the potential to cause, the emission limitations in an applicable standard to be exceeded. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Shutdown: means the cessation of operation of an affected source or portion of an affected source for any purpose.

Startup: means the setting in operation of an affected source or portion of an affected source for any purpose.

x. The permittee shall periodically review the SSMP, as necessary, to reflect changes in equipment or procedures that would affect the emissions unit's operations. Unless determined otherwise by the Director, the permittee may make revisions to the SSMP without prior approval; however, each such revision to the SSMP shall be reported in the semiannual report, as required in this permit (and 40 CFR 63.10(d)(5)).

xi. If the SSMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall revise the SSMP within 45 days after the event, to include detailed procedures for operating and maintaining the emissions unit using a program of corrective actions for the process source, pollution control equipment, and/or monitoring equipment, and which are to be implemented during any similar malfunction event.

xii. The permittee shall maintain a current SSMP at the facility and shall make the plan available, upon request, for inspection and copying by the Director. If the SSMP is revised, the permittee shall maintain each previous (i.e., superseded) version of the SSMP for a period of 5 years after revision of the plan.

xiii. The record keeping requirements contained in this permit include the required documentation of actions taken during startup, shutdown, and malfunction events.

xiv. The permittee shall document in each semiannual report, that actions taken during each startup, shutdown, and malfunction event, during the relevant reporting period, were either consistent or not consistent with the emissions unit's(s') SSMP.

j. The emission standards set forth in this subpart shall apply at all times except during periods of startup, shutdown, and malfunction. The Director shall determine compliance with the applicable emission limitations, operational restrictions, and/or work practice standards through review and evaluation of required records of operational and maintenance procedures, monitoring data, CPMS evaluations, performance testing results, supporting calculations and emissions data, and any other applicable records required in this permit.

c) Operational Restrictions

(1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:

a. Emissions units K004 through K011 shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0107521]

(2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this/these emissions unit(s) is/are 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0107521]

(3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0107521]

(4) The permittee shall recover 100% of all cleanup material employed in emissions units K004-K011.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(5) The permittee shall develop and implement, by the compliance date, a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, additives, and cleaning/purge materials used in the controlled coating

operations and the collection, storage, and/or off-site shipment preparations of waste materials generated by the coating operations. The plan shall specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

a. requirements to maintain all organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials in closed containers;

b. procedures to minimize spills of organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials;

c. requirements to move organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials from one location to another in closed containers or pipes;

d. requirements to keep mixing vessels containing organic HAP-containing coatings, thinners, solvent blends, additives, and/or cleaning materials closed, except when adding, removing, or mixing the contents (where a non-automated/non-mechanical mixing system is used); and

e. procedures to minimize emissions of organic HAP during cleaning of storage, mixing, and conveying equipment.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(6) The permittee shall install, operate, and maintain each continuous parameter monitoring system (CPMS) according to the following requirements:

a. the CPMS must complete a minimum of one cycle of operation for each successive 15-minute period of time, with a minimum of four equally-spaced successive cycles of CPMS operation in 1 hour;

b. the CPMS shall maintain a record of the average of all the readings, as required by Table 1 of subpart MMMM, for each successive 3-hour block of time of coating operations for the emission capture system and thermal oxidizer;

c. the results of each inspection, calibration, validation check, and the certification of each CPMS shall be recorded;

d. the CPMS shall be maintained at all times and the necessary parts for routine repairs and maintenance of the monitoring equipment shall be available on site;

e. each CPMS shall be installed to accurately measure the process and/or the control device parameter;

f. verification of the operational status of each CPMS shall include the completion of the manufacturer's written specifications or the recommendations for installation, operation, and calibration of the system;

g. the read out, (the visual display or measured record of the CPMS) or other indication of operation, shall be readily accessible and visible for monitoring and recording by the operator of the equipment;

h. the CPMS, emission capture system(s), thermal oxidizer, and all required parameter data recordings shall be in operation at all times the controlled coating operation is in process, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and zero and span adjustments); and

i. emission capture system and thermal oxidizer parameter data recorded during monitoring malfunctions, associated repairs, out-of-control periods of the monitor or recorder, or required quality assurance or control activities for the CPMS shall not be used in calculating data averages for determining compliance.

A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the CPMS to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calculations is a deviation from the monitoring requirements.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(7) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit (including the associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the Director (appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency), which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or other standard operating procedures), operation and maintenance records, and inspection of the facility.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(8) The average combustion temperature in the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) in any 3-hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance, and as recommended by the manufacturer until testing.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each coating and cleanup material employed each month for emissions units K004-K013 and R003-R004 combined:

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

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

c. the OC content of each coating and cleanup material employed, as applied, in pounds per gallon;

d. the total controlled OC emission rate for all the coatings and cleanup materials, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance {[summation of d)(1)b. x d)(1)c. (for all coatings and cleanup materials employed] x [(1 - over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance]} ; and

e. the annual year-to-date organic compound emissions (sum of d)(1)d. for each month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(2) The permittee shall collect and record the following information each month for this emissions unit [excluding clean-up/purge materials that are 100% reclaimed as described in b)(2)a.]:

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the miscellaneous metal parts coating operation(s), including information from the supplier or manufacturer, formulation data, and/or coating/material testing data;

b. the number of gallons or liters of each coating, thinner/additive and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic HAP for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:

   i. Method 311 from 40 CFR Part 63, Appendix A;

   ii. Method 24 from 40 CFR Part 60, Appendix A if all non-aqueous volatile matter is to be used for the mass fraction of HAP;

   iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pound HAP/gallon of material ÷ pounds/gallon of material, or calculated in kg/liter); or

   iv. solvent blends listed as single components and where neither test data nor manufacturer's data is available, default values from Table 3 to Subpart MMMM or Table 4 if not listed in Table 3, can be used.

e. the volume fraction of coating solids (gallon of coating solids/gallon of coating or liter of coating solids/liter of coating) for each coating applied which can be calculated using one of the following methods:

   i. divide the nonvolatile volume percent, obtained from either ASTM Method D2697-86 ("Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings") or Method D6093-97 ("Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer"), by 100 to convert percent to the volume fraction of coating solids; or

   ii. calculated from: $V_s = 1 - m_{volatiles} / D_{avg}$

   where:

   V_s is the volume fraction of coating solids, in gallon of coating solids/gallon of coating or liter of coating solids/liter of coating;

   $m_{volatiles}$ is the total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined in accordance to Method 24 in Appendix A of 40 CFR Part 60, in pound of volatile matter per gallon of coating or grams volatile matter per liter of coating;

   D_{avg} is the average density of volatile matter in the coating, i.e., pound of volatile matter per gallon of volatile matter or grams volatile matter per

liter volatile matter, determined from test results using ASTM Method D1475-98 "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" or from information provided by the supplier or manufacturer, or from reference sources providing density or specific gravity data for pure materials; or

iii. the volume fraction of coating solids can be calculated using information provided by the manufacturer, by using the following information to convert percent by weight to percent by volume, if not provided directly:

(a) for each coating, change the percent by weight solids, percent by weight water, and percent by weight total solvent to the same number of "pounds" or "kilograms" (by assuming 100 pounds {or kg} of coating is applied) and divide each component's assumed weight by its density in the coating, to get the gallons of solids, gallons of water, and gallons of solvent;

(b) add the gallons of solids, gallons of water, and gallons of solvent from (a); and

(c) divide the gallons of solids, from (a) by the sum of the gallons of coating components from (b), to get the volume fraction of coating solids (gallon of coating solids per gallon of coating or liter of coating solids per liter of coating);

f. the total mass of organic HAP (pound or kg) in all of the coatings, thinners/additives, and cleanup/purge materials (as purchased) applied during the month, calculated separately for coatings, thinners/additives, and cleanup/purge materials as follows:

$$HAP = \sum_{i=1}^{r} (VOL_i)(D_i)(W_i)$$

where:

HAP is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials used each month, in pound or kg of HAP for each: 1. the coatings (HAP_c), 2. thinners/additives (HAP_t), and 3. cleanup/purge materials (HAP_{cu})

VOL_i is the volume of material "i" documented in (b) above, in gallons or liters.

D_i is the density of material "i" as documented in (c) above, in pounds/gallon or kg/liter.

$W_i$is the mass fraction of organic HAP in material "i" as calculated in (d) above, in pound/pound or kg/kg.

r is the number of coatings, the number of thinners/additives, or the number of cleanup/purge materials used during the month, each source (coating, thinner/additive, cleanup/purge) calculated separately for its HAP, and

g. the total mass of organic HAP applied each month in each coating operation, in pound or kg of HAP, calculated as follows:

$$H_{TOT} = HAP_c + HAP_t + HAP_{cu} - R_w$$

where:

H_{TOT} is the total mass of organic HAP applied each month in each coating operation, in pound or kg of HAP, i.e., the sum of the total mass of HAP calculated for each material, above; minus the calculated HAP in recovered materials, R_w, if meeting the requirements for this allowance.

HAP_c is the total mass of organic HAP in all the coatings used during the month, summed from the total mass of HAP calculated from all the coatings applied, as required in (f) above, in pound or kg.

HAP_t is the total mass of organic HAP in all the thinners and additives used during the month, summed from the total mass of HAP calculated from all the thinners/additives applied, as required in (f) above, in pound or kg.

HAP_{cu} is the total mass of organic HAP in all cleanup and purge materials used during the month, summed from the total mass of HAP calculated from all the cleanup/purge materials applied, as required in (f) above, in pound or kg.

R_w is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste treatment, storage, and disposal facility (TSDF) for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to R_w if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for recovery or disposal).

h. the total volume of coating solids applied during the month, calculated as follows:

$$VOL_s = \sum_{h=1}^{m} (VOL_h)(V_h)$$

where:

VOL_s is the total volume of coating solids used during the month, in gallons or liters.

VOL_h is the total volume of coating “h” used during the month, as documented in (b) above, in gallons or liters.

V_h is the volume fraction of coating solids for coating "h", in liter of solids per liter of coating or gallon of solids per gallon of coating, calculated as required in (e) above.

m is the number of coatings applied during the month.

i. the mass of organic HAP emission reduction for the month for the controlled coating operations, using the emissions capture system and the thermal oxidizer control, calculated as follows:

$HAP_{contr} = (A_c + B_t + C_{cu} - R_w - H_{dev}^*)\ (CE/100 \times DRE/100)$

where:

HAP_{contr} is the mass of organic HAP emission reduction for the controlled coating operations (or calculated for each system) during each month, in pound or kg.

* H_{dev} If an operating parameter deviates from that established as required in Table 1 to this subpart or if there is a malfunction of the CPMS equipment or the capture or control devices, the capture and control efficiency shall be assumed to be zero during the period of deviation unless an approval to use other efficiency data is obtained, per 40 CFR 63.3963(c)(2).

A_c is the total mass of organic HAP in the coatings used in the coating operations controlled by the thermal oxidizer collection and control system during the month, calculated as follows:

$$A_c = \sum_{h=1}^{r} (VOL_h)\ (D_h)\ (W_h)$$

where:

A_c is the total mass of organic HAP in the coatings used in the coating operations controlled by the thermal oxidizer during the month, in pound or kg.

VOL_h is the volume of coating "h" used in the coating operations controlled by the thermal oxidizer during the month, in gallons or liters.

D_h is the density of coating "h" used in the coating operations controlled by the thermal oxidizer during the month, in pounds/gallon or kg/liter.

W_h is the mass fraction of organic HAP in coating "h" used in the coating operations controlled by the thermal oxidizer during the month, in pound/pound or kg/kg.

r is the number of coatings used in the coating operations controlled by the thermal oxidizer during the month.

B_t is the total mass of organic HAP in the thinners/additives used in the coating operations controlled by the thermal oxidizer during the month, calculated as follows:

$$B_t = \sum_{j=1}^{q} (VOL_j)(D_j)(W_j)$$

where:

B_t is the total mass of organic HAP in the thinners/additives used in the coating operations controlled by the thermal oxidizer during the month, in pound or kg.

VOL_j is the volume of thinner/additive "j" used in the coating operations controlled by the thermal oxidizer during the month, in gallons or liters.

D_j is the density of thinner/additive "j" used in the coating operations controlled by the thermal oxidizer during the month, in pounds/gallon or kg/liter.

W_j is the mass fraction of organic HAP in thinner/additive "j" used in the coating operations controlled by the thermal oxidizer during the month, in pound/pound or kg/kg.

q is the number of thinners/additives used in the coating operations controlled by the thermal oxidizer during the month.

C_{cu} is the total mass of organic HAP in the cleanup/purge materials used in the coating operations controlled by the thermal oxidizer during the month, calculated as follows:

$$C_{cu} = \sum_{k=1}^{s} (VOL_k)(D_k)(W_k)$$

where:

C_{cu} is the total mass of organic HAP in the cleanup/purge materials used in the coating operations controlled by the thermal oxidizer during the month, in pound or kg.

VOL_k is the volume of cleanup/purge material "k" used in the coating operations controlled by the thermal oxidizer during the month, in gallons or liters.

D_k is the density of cleanup/purge material "k" used in the coating operations controlled by the thermal oxidizer during the month, in pounds/gallon or kg/liter.

W_k is the mass fraction of organic HAP in cleanup/purge material "k" used in the coating operations controlled by the thermal oxidizer during the month, in pound/pound or kg/kg.

s is the number of cleanup/purge materials used in the coating operations controlled by the thermal oxidizer during the month.

R_w is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to R_w if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for recovery or disposal).

H_{dev} is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials applied during all periods of deviation during the month in the controlled coating operation(s), calculated as follows:

$$H_{dev} = \sum_{d=1}^{q} (VOL_d)(D_d)(W_d)$$

where:

H_{dev} is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials applied during all periods of deviation during the month in the controlled coating operation(s), in pound or kg.

VOL_d is the volume of coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in gallons or liters.

D_d is the density of coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in pounds/gallon or kg/liter.

W_d is the mass fraction of organic HAP in coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in pound/pound or kg/kg.

q is the number of different coatings, thinners/additives, and cleanup/purge materials applied during periods of deviation during the month.

CE is the capture efficiency of the emission capture system vented to the thermal oxidizer, in percent.

DRE is the organic HAP destruction efficiency of the thermal oxidizer, in percent.

j. the mass of organic HAP emissions for each month, calculated as follows:

$$HAP_T = [H_2 - \sum_{b=1}^{x}(HAP_{contr,\,b})] + [\sum_{d=1}^{z} H_4]$$

where:

HAP_T is the total mass of organic HAP emissions for the month, in pound or kg.

H_2 and/or H_4 is/are calculated for each coating operation, prior to control, as H_{TOT} in (g) above.

H_2 is the total mass of organic HAP contained in the coatings, thinners/additives, and cleanup materials applied during the month in the controlled coating operations, (H_2 is calculated as the sum of the total mass of HAP from all materials applied in the coating operation(s) controlled by a/the thermal oxidizer, minus the HAP content in any materials collected and sent to a hazardous waste TSDF (R_w) if meeting the requirements for this reduction), in pound or kg.

H_4 is the total mass of organic HAP contained in the coatings, thinners/additives, and cleanup materials applied during the month in any uncontrolled coating operations (H_4 is calculated as the sum of the total mass of HAP from all materials applied in each uncontrolled coating operation, minus the HAP content in any materials collected and sent to a hazardous waste TSDF (R_w) if meeting the requirements for this reduction), in pound or kg.

$HAP_{contr,\,b}$ is the total mass of organic HAP emission reduction for the month, for the thermal oxidizer control for coating operation “b”, calculated as required in (i) above.

x is the number of controlled coating operations where emissions are captured and vented to the thermal oxidizer.

z is the number of coating operations without control.

k. the total organic HAP emission rate for the 12-month compliance period, in pound of HAP per gallon of coating solids applied or kg of HAP per liter of coating solids applied during the rolling, 12-month compliance period, calculated as follows:

$$HAP_{comply} = \sum_{y=1}^{n} (HAP_{T,y}) / \sum_{y=1}^{n} (VOL_{s,y})$$

HAP_{comply} is the organic HAP emission rate for the 12-month compliance period, in pound organic HAP emitted per gallon of coating solids applied or kg organic HAP emitted per liter of coating solids applied.

$HAP_{T,y}$ is the total mass of organic HAP emissions from all materials used during month y, calculated in (j) above, in pound or kg.

$VOL_{s,y}$ is the total volume of coating solids used during month y, calculated in (h) above, in gallons or liters.

y is the identifier for the month.

n is the number of full or partial months in the compliance period; for the initial compliance period, n equals 13 where the compliance date does not fall on the first day of the month; for all following compliance periods n equals 12; and

l. all calculations required above for each monthly rolling, 12-month compliance period.

In order to demonstrate continuous compliance, the organic HAP emission rate for each rolling, 12-month compliance period must be less than or equal to the applicable emission limit in 40 CFR 63.3890. The compliance demonstration shall be conducted on a monthly basis, using the data from the previous 12 months of operation, as documented through the above calculations and records.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(3) The permittee shall also maintain records of the following documentation for all controlled coating operations:

a. a copy of each notification, report, each performance test, supporting documentation, and each rolling, 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP, including the results from each compliance demonstration and records establishing the operating limits during performance testing as required in 40 CFR 63.3892 and as specified in 40 CFR 63.3967;

b. records of the coating operation conditions during the thermal oxidizer organic HAP destruction and/or removal efficiency determination, to document the representative operating conditions during compliance testing;

c. records for establishing the criteria for the permanent total enclosure and the test data documenting that the enclosure used for each capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 and has a capture efficiency or 100%; or

d. records for establishing the criteria for the temporary total enclosure or building enclosure:

i. if using the liquid-to-uncaptured-gas protocol the record shall include:

(a) the mass of total volatile hydrocarbon (TVH) as measured by Method 204A or 204 F of Appendix M to 40 CFR Part 51, for each material used in the coating operation during each capture efficiency test run, including a copy of the test report;

(b) the total TVH for all materials used during each capture efficiency test run, including a copy of the test report;

(c) the mass of TVH emissions not captured, that exited the temporary enclosure or building enclosure during each capture efficiency test run, as measured my Method 204D of 204 E of Appendix M to 40 CFR Part 51, including a copy of the test report; and

(d) records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 for either a temporary total enclosure or a building enclosure;

ii. if using the gas-to-gas protocol the record shall include:

(a) the mass of TVH emissions captured by the emission capture system, as measured by Method 204B or 204C of Appendix M to 40 CFR Part 51, at the inlet to the thermal oxidizer, including a copy of the test report;

(b) the mass of TVH emissions not captured, that exited the temporary enclosure or building enclosure during each capture efficiency test run, as measured my Method 204D of 204 E of Appendix M to 40 CFR Part 51, including a copy of the test report; and

(c) records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 for either a temporary total enclosure or a building enclosure;

e. a record of the work practice plans required per 40 CFR 63.3893 and any operational and maintenance records or inspections that would document the plans are/were implemented on a continuous basis;

f. records pertaining to the design and operation of control and monitoring systems, maintained on site for the life of the equipment;

g. results of each inspection, calibration and validation check, and certification of the continuous parameter monitoring system(s);

h. the average of all recorded readings of the continuous parameter monitoring system(s) for each successive 3-hour period of operation of the emission capture system and thermal oxidizer;

i. the date, time, and duration of each deviation and whether it occurred during a period of startup, shutdown, or malfunction, to include any bypass of the capture and/or add-on control systems;

j. if using the predominant activity alternative under 40 CFR 63.3890(c)(1), records of the data and calculations used to determine the predominant activity;

k. if using the "facility-specific emission limit" alternative under 40 CFR 63.3890(c)(2), data used to calculate the "facility-specific" emission limit; and

l. the records required per 40 CFR 63.6(e)(3), established in the startup, shutdown, and malfunction plan required in this permit.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(4) The permittee shall meet the following requirements for any bypass line to the capture and add-on control system, that could divert emissions from the coating operations to the atmosphere:

a. The valve or closure mechanism controlling the bypass line shall be secured in a nondiverting position, in such a way that the valve or closure mechanism cannot be opened without creating a record documenting that the valve was opened. The method used to monitor or secure the valve or closure mechanism shall meet one of the following requirements:

i. A flow control position indicator shall be Installed, calibrated, maintained, and operated according to the manufacturer's specifications. The flow control position indicator shall take a reading at least once every 15 minutes and shall provide a record indicating that the emissions are captured and directed to the thermal oxidizer. The flow indicator shall record the time of the reading, the flow control position, and shall maintain

a record of every time the flow direction is changed. The flow control position indicator shall be installed at the entrance to any bypass line that could divert the emissions away from the thermal oxidizer to the atmosphere; or

ii. The bypass line valve shall be secured in the closed position using a car-seal or a lock-and-key. The seal or closure mechanism shall be inspected at least once every month to ensure that the valve is maintained in the closed position and that the emissions from the coating operations are captured and delivered to the thermal oxidizer. A log or record of the monthly inspection shall be maintained and made available to the regulating agency upon request; or

iii. A valve closure monitoring system shall be installed, operated, and maintained to ensure that any bypass line valve is in the closed (nondiverting) position at all times. The valve closure monitoring system shall monitor the valve position at least once every 15 minutes. The monitoring system shall be inspected at least once every month to verify that the monitor correctly indicating valve position. A log or record of the monthly inspection of the valve closure monitoring system shall be maintained and made available to the regulating agency upon request; or

iv. An automatic shutdown system shall be installed, operated, and maintained to shut down the coating operation(s) when air flow is diverted by the bypass line away from the capture system and thermal oxidizer. The automatic shutdown system shall be inspected at least once every month to verify that it will detect diversions of flow and shut down the coating operation(s). A log or record of the monthly inspection of the automatic shutdown system shall be maintained and made available to the regulating agency upon request; or

v. The permittee shall install, calibrate, maintain, and operate a flow direction indicator according to the manufacturer's specifications. The flow direction indicator shall take a reading at least once every 15 minutes and shall provide a record indicating that the emissions are captured and directed to the thermal oxidizer. The flow indicator shall record the time of the reading, the air flow direction, and shall maintain a record of every time the flow direction is changed. The flow direction indicator shall be installed at the entrance to any bypass line that could divert the emissions away from the thermal oxidizer to the atmosphere.

b. If any bypass line is opened, a record shall be created to document reason for the bypass and the length of time it remained open. The deviation shall be included in the semiannual compliance reports as required in 40 CFR 63.3920 and this permit.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(5) The emission capture system shall be installed, operated and maintained according to the following requirements:

a. Each flow measurement device shall meet the following requirements:

i. The flow sensor shall be located in a position that provides a representative flow measurement in the duct from each capture device in the emission capture system to the thermal oxidizer.

ii. Each flow sensor shall have an accuracy of at least 10 percent of the flow.

iii. An initial sensor calibration shall be performed in accordance with the manufacturer's requirements or recommendations.

iv. A validation check shall be performed before initial use or upon relocation or replacement of a sensor. Validation checks include comparison of sensor values with electronic signal simulations or via relative accuracy testing.

v. An accuracy audit shall be conducted every quarter and after every deviation. Accuracy audit methods include comparisons of sensor values with electronic signal simulations or via relative accuracy testing.

vi. Monthly leak checks shall be conducted and a record shall be maintained of the date and the location of each flow measurement device checked. These records shall be made available to the regulating agency upon request.

vii. Quarterly visual inspections shall be conducted for each sensor system and a record shall be maintained of the date and the location of each sensor inspected.

b. Each pressure drop measurement device shall comply with the following requirements:

i. Each pressure sensor device shall be located in or as close to a position that provides a representative measurement of the pressure drop across the opening it was installed to monitor.

ii. Each pressure sensor device shall have an accuracy of at least 0.5 inches of water column or 5 percent of the measured value, whichever is larger.

iii. Each pressure sensor shall initially be calibrated according to the manufacturer's requirements or recommendations.

iv. A validation check shall be conducted before initial operation or upon relocation or replacement of any sensor. Validation checks include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.

v. An accuracy audit shall be conducted every quarter and after every deviation. Accuracy audits include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.

vi. Monthly leak checks shall be conducted on each pressure connection. A pressure of at least 1.0 inches of water column to the connection must yield a stable sensor result for at least 15 seconds. A log or record of the monthly leak checks, to include the date and location of the pressure connection, shall be maintained and made available to the regulating agency upon request.

vii. A monthly visual inspection of each sensor shall be conducted and a log or record of the inspection, to include the date and location, shall be maintained and made available to the regulating agency upon request.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(6) The permittee shall maintain records of the following information for a period of 5 years following the date of each occurrence, measurement, maintenance activity, corrective action, report, and/or record:

a. the occurrence and duration of each startup or shutdown when the startup or shutdown causes the emissions unit to exceed any applicable emission limitation in the NESHAP;

b. the occurrence and duration of each malfunction of operation (i.e., process equipment) and/or the required air pollution control and monitoring equipment;

c. all required maintenance performed on the air pollution control and monitoring equipment, i.e., date, equipment, maintenance activity performed;

d. actions taken during periods of startup and shutdown, when the emissions unit exceeds any applicable emission limitation in the NESHAP, and when these actions are different from the procedures specified in the emissions unit's startup, shutdown, and malfunction plan (SSMP);

e. actions taken during periods of malfunction (of the process, the air pollution control equipment, and/or the monitoring equipment) that are different from the procedures specified in the emissions unit's SSMP;

f. actions taken to demonstrate compliance with the SSMP during periods of startup and/or shutdown, where an applicable NESHAP emission limitation was exceeded; and actions taken during any malfunction (of the process, the air pollution control equipment, and/or the monitoring equipment), where the actions are consistent with the procedures specified in the SSMP*;

g. each period of operation (date and number of hours) during which a/the continuous monitoring system (CMS) is inoperative or is not functioning properly;

h. all required measurements needed to demonstrate compliance with the limitations contained in this permit, including, but not limited to: the 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and any supporting data needed to demonstrate compliance with the limitations and reporting requirements of the NESHAP;

i. all results of performance tests, CMS performance evaluations, and opacity and visible emission observations;

j. all measurements needed to determine the conditions of performance tests and performance evaluations, including the analysis of samples, determination of emissions, and raw data;

k. all CMS calibration checks;

l. all adjustments and maintenance performed on CMS; and

m. all documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9, and as required in this permit.

*The information needed to demonstrate compliance with the SSMP plan may be recorded using a "checklist" or some other effective form of record keeping, in order to minimize the recording burden for conforming procedures.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(7) The permittee shall maintain the following records for the continuous monitoring system (CMS) in accordance with the general requirements of 40 CFR 63.10(c) as follows:

a. all required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);

b. the date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;

c. the date and time identifying each period during which the CMS was out of control;

d. the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the NESHAP, that occurs during startups, shutdowns, and malfunctions of the emissions unit;

e. the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the NESHAP, that occurs during periods other than startups, shutdowns, and malfunctions of the emissions unit;

f. the nature and cause of any malfunction (if known);

g. the corrective action taken or preventive measures adopted;

h. the nature of the repairs or adjustments to the CMS whenever it/they is/are inoperative or out of control;

i. the total process operating time during the reporting period; and

j. all records of the procedures that are required as part of a quality control program, developed and implemented for the CMS under 40 CFR 63.8(d), as reflected in this permit.

To avoid duplication of records, the permittee may maintain the records for the information in d)(7)f., d)(7)g., and d)(7)h. as part of the SSMP.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(8) If using the allowance for an emission reduction of the uncontrolled/pre-controlled emissions for organic HAP contained in waste materials sent to (or designated for shipment to) a hazardous waste TSDF during the month, the permittee shall maintain records of the following information:

a. the name and address of each hazardous waste TSDF to which waste materials were sent or are scheduled to be sent, and for which an allowance was applied to the calculated uncontrolled/pre-controlled emissions;

b. a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to each hazardous waste TSDF;

c. for each allowance applied in any month:

i. the volume, weight, and source of recovered material collected and an identification of the coating operations producing the waste materials;

ii. the month the allowance was applied and the mass of organic HAP used as the allowance, including the calculations;

iii. the date the recovered material was shipped and its volume and weight (excluding the weight of the container) at the time of shipment to the hazardous waste TSDF and the manifest number accompanying the shipment;

iv. the methodology used to determine the total amount of waste materials collected;

v. the methodology used to determine the mass of organic HAP contained in the wastes, sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment; and

d. for each container of recovered materials shipped to a hazardous waste TSDF, the following records shall be maintained in a log:

i. the date each container was first used and the date of the last addition;

ii. the date and amount of recovered materials added, from first to the last addition;

iii. the date the container was shipped and identification of which hazardous waste TSDF it was shipped to, if more than one facility in (a) above; and

iv. the volume and weight of the material as it was recorded on the waste manifest (minus the weight of the container, if included).

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(9) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) when the emissions unit is in operation. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee; and shall be capable of accurately measuring the temperature. The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained during the performance test that demonstrated compliance, or below the temperature recommended by the manufacturer until performance testing is completed; and

b. a log of the downtime for the capture (collection) system, thermal oxidizer, and/or monitoring equipment when the associated emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(10) The permittee shall maintain records that document any cleanup operations for K004-K013 which were not performed as described in b)(2)a.and/or reclaimed as specified in d)(1)e.above.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(11) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(12) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(13) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(14) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(15) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(16) The permit-to-install application for these emissions unit(s), K004-K013, and R001-R004 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground

level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the "American Conference of Governmental Industrial Hygienists" (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the "American Conference of Governmental Industrial Hygienists" (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

   $$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

   Toxic Contaminant: toluene

   TLV (mg/m3): 188.4

   Maximum Hourly Emission Rate (lbs/hr): 9.43

   Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 287.3

   MAGLC (ug/m3): 4486

The permittee, has demonstrated that emissions of toluene, from emissions unit(s) K004-K013, and R001-R004, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or

processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[Authority for term: PTI #P0107521]

(17) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour "maximum ground level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[Authority for term: PTI #P0107521]

(18) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[Authority for term: PTI #P0107521]

(19) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[Authority for term: PTI #P0107521]

e) Reporting Requirements

(1) The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R003-R004, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(2) The permittee shall submit an initial notification of compliance status report no later than 30 calendar days following the end of the initial compliance period (documented in the "Additional Terms and Conditions" section of this permit). The initial notification of compliance shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of the compliance method for each coating operation, i.e., if using "compliant materials"; the capture and control device(s) employed and the estimated or demonstrated efficiency of each; and a statement as to if cleanup solvents were collected for recovery or disposal and if they were shipped to a certified hazardous waste TSDF;

e. statement of whether the affected source achieved the emission limitations for the initial compliance period;

f. if there was a deviation during the initial compliance period, a description of the deviation and statement of the cause and the calculations of emissions used to determine noncompliance with the applicable limitation(s);

g. calculations and supporting documentation for the coatings, thinners, and cleanup materials applied (information from supplier or manufacturer or summary of testing results) and waste materials sent to a hazardous waste TSDF, if used, to include the following:

   i. mass fraction of organic HAP for one coating, one thinner and/or other additive, and one cleanup/purge material;

   ii. the volume fraction of coating solids for one coating;

   iii. density for one coating, one thinner and/or other additive, and one cleanup/purge material; and

   iv. the average amount of waste materials collected in any month and average mass of organic HAP contained in the waste materials sent off-site to a hazardous waste TSDF;

h. for coating operations meeting the emissions limitation without add-on controls, the calculations of the total organic HAP emission rate for the 12-month compliance period, from the coatings, thinners/additives, and cleaning materials used each month, to include:

   i. the calculations of the total volume of coating solids used each month;

   ii. the calculations of the total mass of organic HAP emissions for each month; and

   iii. the calculation of the initial 12-month organic HAP emission rate;

i. for coating operations meeting the emissions limitation with add-on controls the calculations of the total organic HAP emission rate for the 12-month compliance period, from the coatings, thinners/additives, and cleaning materials used each month, to include:

   i. the calculations of the total volume of coating solids used each month;

   ii. the calculations of the mass of organic HAP emission reduction for each month for the emission capture systems and thermal oxidizers;

   iii. the calculations of the total mass of organic HAP emissions for each month; and

   iv. the calculation of the initial 12-month organic HAP emission rate;

j. information for the add-on-controls and capture system:

   i. a summary of the data and copies of the calculations supporting the determination that each emissions capture system is a permanent total

enclosure or a measurement of the emission capture system's efficiency, including the protocol/procedures followed;

ii. a summary of the results of each capture efficiency test and performance test conducted for the thermal oxidizer; and

iii. a list of each emission capture system's and thermal oxidizer's operating limits and summary of the data used to establish these parameter limitations;

k. a statement of whether or not the work practice plan was developed and implemented;

l. if using the predominant activity alternative under 40 CFR 63.3890(c)(1), the data and calculations used to determine the predominant activity; and

m. if using the "facility-specific emission limit" alternative under 40 CFR 63.3890(c)(2), the calculation of the "facility-specific" emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(3) The permittee shall submit semiannual compliance reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is each 6-month period of time ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and the beginning and ending dates of the reporting period;

d. identification of the compliance method for each coating operation;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period;

g. if using the predominant activity alternative according to 40 CFR 63.3890(c)(1), the annual determination of predominant activity if it was not included in the previous semi-annual compliance report;

h. if using the "facility-specific emission limit" alternative according to 40 CFR 63.3890(c)(2), the calculation of the "facility-specific" emission limit for each 12-month compliance period during the 6-month reporting period;

i. if there were no deviations from the emission limitations in 63.3890, the operating limits in 40 CFR 63.3892, or the work practice standards in 40 CFR 63.63.3893, a statement that there were no deviations from the emissions limitations during the reporting period;

j. if there were no periods of operation during which the continuous parameter monitoring system(s) (CPMS) was/were out-of-control, as specified in 40 CFR 63.8(c)(7), a statement that there were no periods of time when the CPMS was/were out-of-control during the reporting period; and

k. if there were any deviations during the compliance period, from the controlled coating operation, the report shall include the following information:

   i. the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;

   ii. any periods of time when emissions bypassed the thermal oxidizer and were diverted to the atmosphere;

   iii. the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including the total mass of organic HAP emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

   iv. if applicable, the calculation used to determine mass of organic HAP in waste materials;

   v. the calculation of the total volume of coating solids used each month, as required in this permit;

   vi. the calculation of the mass of organic HAP emission reduction each month by emission capture systems and thermal oxidizers, as required in this permit;

   vii. the calculation of the total mass of organic HAP emission rate each month of deviation and the 12-month emission rate, as required in this permit, in kg (or lb) of organic HAP per liter (or gallon) of coating solids applied;

   viii. the date and time that each malfunction started and stopped;

   ix. a brief description of the continuous parameter monitoring system (CPMS);

   x. the date of the latest CPMS certification or audit;

   xi. the date(s) and time that each CPMS was inoperative, except for zero/low-level and high-level checks;

xii. the date(s), time, and duration (start and end dates and hours) that each CPMS was out-of-control and the corrective actions taken, per 40 CFR 63.8(c)(8);

xiii. the date, time, and duration of each deviation from any operating limit(s) contained in this permit, from Table 1 to this subpart, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period;

xiv. the date, time, and duration of any bypass of the thermal oxidizer, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period;

xv. a summary of the total duration of each deviation from an operating limit in Table 1 to this subpart during the semiannual reporting period, and the total duration as a percent of the total source operating time during the semiannual reporting period;

xvi. a summary of each bypass of the thermal oxidizer during the semiannual reporting period, and the total duration as a percent of the total source operating time during the semiannual reporting period;

xvii. a breakdown of the total duration of the deviations from the operating limits established as required in Table 1 to this subpart and any bypasses of the thermal oxidizer during the semiannual reporting period into those that were due to startup, shutdown, control equipment problems, process problems, and other known or unknown causes;

xviii. a summary of the total duration of CPMS downtime during the semiannual reporting period, and the total duration of the CPMS downtime as a percent of the total source operating time during the semiannual reporting period;

xix. a description of any changes in the CPMS, coating operation emission capture system, or thermal oxidizer since the last semiannual reporting period;

xx. for each deviation from the work practice standards, a description of the deviation, the date and time period of the deviation, and the action taken to correct the deviation; and

xxi. a statement of the cause of each deviation.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(4) The permittee shall include the following information in the semiannual report for any monthly record where the allowance for an emission reduction was applied in the uncontrolled/pre-controlled HAP emissions calculations for materials that were shipped (or scheduled to be shipped) to a hazardous waste TSDF:

a. any monthly record where measurements were not taken or appropriate records were not maintained for recovered material(s) that were applied as an emission reduction in the calculated HAP emissions before add-on controls and used to demonstrate compliance with the NESHAP and the limitations in this permit;

b. any record of recovered solvent that was not finally shipped to a hazardous waste TSDF and/or was shipped to a TSDF not regulated under 40 CFR Parts 262, 264, 265, or 266 and which was also applied as an emission reduction to HAP emissions prior to add-on controls;

c. any record of discrepancy between the total volume or weight of material(s) collected and the total volume shipped to a hazardous waste TSDF, as documented in the recovered materials log;

d. any record of recovered material being applied more than one time in a monthly compliance demonstration; and/or

e. a miscalculation of the HAP emission reduction calculation for recovered materials sent to a hazardous waste TSDF.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(5) The permittee shall include startup, shutdown, and malfunction reports in the semiannual report if actions taken by the permittee during a startup, shutdown, and/or malfunction are consistent with the procedures specified in the facility startup, shutdown, and malfunction plan. The startup, shutdown, and/or malfunction report shall consist of a letter containing the name of the responsible official and his certification that all startup, shutdown, or malfunction events were conducted according to the plan.

If actions taken during any startup, shutdown, or malfunction were not consistent with the startup, shutdown, and malfunction plan, the permittee shall submit immediate startup, shutdown, and/or malfunction reports as follows:

a. If actions taken during any startup, shutdown, or malfunction were not consistent with the startup, shutdown, and malfunction plan, the permittee shall submit immediate startup, shutdown, and/or malfunction reports as follows:

b. unless alternative arrangements are made, within 7 working days after the end of the event, a letter shall be sent to the appropriate Ohio EPA District Office or local air agency and it shall contain:

i. the name, title, and signature of the responsible official who is certifying the accuracy of the report,

ii. an explanation of the circumstances of the event, i.e., the reasons for not following the startup, shutdown, and malfunction plan; and

iii. if any excess emissions and/or parameter monitoring exceedances have occurred.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(6) The permittee shall immediately report a startup, shutdown, and/or malfunction event to the regulating agency when either of the following scenarios occur:

a. actions taken by the permittee/operator during a startup or shutdown cause the emissions unit(s) to exceed an emission limitation from the NESHAP and procedures specified in the SSMP are not followed; and/or

b. actions taken during a malfunction are not consistent with the procedures specified in the SSMP.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(7) The immediate report shall consist of a telephone call (or facsimile {FAX} transmission) to the Director within 2 working days after commencing actions inconsistent with the plan, and it shall be followed by a letter, delivered or postmarked within 7 working days after the end of the event. The written report shall contain:

a. the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy;

b. the explanation of the circumstances of the event;

c. the reasons for not following the SSMP;

d. description of all excess emissions and/or parameter monitoring exceedances which are believed to have occurred (or could have occurred in the case of malfunctions); and

e. actions taken to minimize emissions in conformance with 40 CFR 63.6(e)(1)(i) and as required in this permit.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(8) Performance test results for the emission capture system(s) and thermal oxidizer(s) shall be submitted no later than 30 days after completion of the performance test(s). Results of each performance test shall include the analysis of samples, determination of emissions, and the supporting raw data. Performance testing results shall be retained for a minimum of 5 years from the test date and shall be made available to the Director, or representative of the Director, upon request.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(9) The permittee shall identify in the semiannual reports all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature

maintained and established during the most recent performance test that demonstrated compliance.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

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

a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation; and

b. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31, April 30, July 31, and October 31, and shall cover the previous calendar quarters unless an alternative schedule has been established and approved by the Director (Ohio EPA, Northwest District Office).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(11) The permittee shall notify the Director (Ohio EPA, Northwest District Office) in writing of any daily record showing that cleanup operations which were not performed as described in b)(2)a. and/or reclaimed as specified in c)(3) above. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(12) 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.

[Authority for term: OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for emissions units R003, R004, and K004 through K013 in accordance with the following requirements:

a. The emissions testing shall be conducted within 6 months after issuance of this permit, and every 2.5 years thereafter, unless otherwise approved by the Ohio EPA, Northwest District Office.

b. The emission testing shall be conducted in order to determine the capture efficiency of each emission capture system vented to the thermal oxidizer(s) and the destruction efficiency of the thermal oxidizer(s), both in percent. The current configuration of the control system involves a redundancy by having the ability to employ one of two available RTOs during operation. The permittee will be required to perform emission testing on any RTO which will be employed for purposes of complying with the requirements of this permit (i.e. if the permittee should elect to switch which RTO is employed then testing for each RTO individually must be conducted to demonstrate compliance).

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. Method 1 of 1A of Appendix A to 40 CFR Part 60, to select sampling sites and velocity traverse points;

ii. Method 2, 2A, 2C, 2D, 2F or 2G of Appendix A to 40 CFR Part 60, as appropriate, to measure gas volumetric flow rate;

iii. Method 3, 3A, or 3B of Appendix A to 40 CFR Part 60, as appropriate, for gas analysis to determine dry molecular weight;

iv. Method 4 of Appendix A to 40 CFR Part 60, to determine stack gas moisture;

v. Method 25 or 25A, to determine the total gaseous organic mass emissions as carbon at the inlet and outlet of the thermal oxidizer, simultaneously, using:

(a) Method 25 if testing an oxidizer with expected carbon concentrations to exceed 50 ppm

(b) Method 25A if testing an oxidizer with expected carbon concentrations to be 50 ppm or less, or if the control is not an oxidizer; and

vi. Method 204 A through 204F (appropriate method) of Appendix M to 40 CFR Part 51 to determine the capture efficiency.

d. The test(s) shall be conducted while the emissions unitsare operating at or near maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The total gaseous organic emissions mass flow rates shall be determined at the inlet and the outlet of the thermal oxidizer for each of the 3 test runs.

f. The total gaseous organic emissions mass flow rates shall be determined at the inlet and the outlet of the thermal oxidizer for each of the 3 test runs.

$M_f = Q_{sd}\ C_c\ (12)\ (0.0416)\ (10^{-6})$

where:

M_f is the total gaseous organic emissions mass flow rate, in kg/hr.

Q_{sd} is the volumetric flow rate of gases entering or exiting the thermal oxidizer, as determine by Method 2, 2A, 2C, 2D, 2F or 2G, in dscm/hour.

C_c is the concentration of organic compounds as carbon in the vent gas, as determined by Method 25 or 25A, in parts per million by volume on a dry basis (ppmv).

0.0416 is the conversion factor for molar volume, Kg-moles per cubic meter (mol/m^3) @ 293 degrees Kelvin and 760 mmHg.

g. For each test run the thermal oxidizer's organic emissions destruction efficiency shall be calculated as follows:

$DRE = [(M_{fi} - M_{fo}) / M_{fi}] \times 100$

where:

DRE is the organic emissions destruction efficiency of the thermal oxidizer, in percent.

M_{fi} is the total gaseous organic emissions mass flow rate at the inlet(s) to the thermal oxidizer, from the equation above, in kg/hour.

M_{fo} is the total gaseous organic emissions mass flow rate at the outlet(s) to the thermal oxidizer, from the equation above, in kg/hour.

The emission destruction or removal efficiency of the thermal oxidizer shall be the average of the efficiencies determined in the three test runs.

h. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

i. Personnel from the appropriate Ohio EPA District Office or local air agency 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.

j. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(2) The permittee shall conduct a performance test of each emission capture system when operating at a representative flow rate and when the thermal oxidizer is operating at a representative inlet concentration. The capture efficiency of each emission capture system shall be determined using one of the following methods. If the capture system does not meet the criteria for a permanent total enclosure in f)(2)a., the permittee shall determine the capture efficiency of each emissions capture system for the coating operations using either the "liquid-to-uncaptured-gas protocol" in f)(2)b. or the "gas-to-gas protocol" in f)(2)c.:

a. The capture system efficiency can be assumed to be 100% if both of the following conditions are met:

i. the capture system meets the criteria in Method 204 found in 40 CFR Part 51, Appendix M for a permanent total enclosure and all the exhaust gases from the enclosure are directed to the thermal oxidizer.

ii. all coatings, thinners and or other additives, and cleaning materials used in the coating operation are applied within the capture system; coating solvent flash-off, curing, and drying occurs within the capture system; and the removal or evaporation of cleaning materials from the surfaces they are applied to occurs within the capture system.

b. The liquid-to-uncaptured-gas protocol compares the mass of liquid total volatile hydrocarbon (TVH) in materials used in the coating operation to the mass of TVH emissions not captured by the emission capture system. To measure the emission capture system efficiency using the liquid-to uncaptured gas protocol the following procedures shall be followed:

i. The coating operations must be enclosed either by using the building enclosure or by constructing an enclosure around all operations where coatings, thinners and/or other additives, and cleaning materials are applied and any areas following the application where emissions from these applied coatings and thinners/additives and cleaning materials subsequently occur (flash-off, curing, and drying areas). Areas where capture devices collect emissions for routing to the thermal oxidizer, such as the entrance and exit areas of an oven or spray booth must also be inside the enclosure. The enclosure must meet the definition of a temporary total enclosure or building enclosure in Method 204 found in 40 CFR Part 51, Appendix M.

ii. Method 204A or 204F in 40 CFR Part 51, Appendix M shall be used to determine the mass fraction of TVH liquid input from each coating, thinner and/or other additive, and cleaning material used in the coating operation during each capture efficiency test run. Substitute TVH for each occurrence of the term volatile organic compounds (VOC) in the methods. Each test run must be at least 3 hours in duration or the length of a production run, whichever is longer, up to 8 hours.

iii. Calculate the total mass of TVH liquid input from all coatings, thinners and/or additives, and cleaning materials used in the coating operation during each capture efficiency test run as follows:

$$TVH_{used} = \sum_{i=1}^{n} (TVH_i)(VOL_i)(D_i)$$

where:

TVH_{used} is the mass of liquid TVH in the materials used in the coating operation during the capture efficiency test run, in kg or pound.

TVH_i is the mass fraction of TVH in coating, thinner and/or other additive, or cleaning material "i" that is used in the coating operation during the capture efficiency test run, in kg of TVH per kg material or pound of TVH per pound material.

VOL_i is the total volume of coating, thinner and/or other additive, or cleaning material "i" used in the coating operation during the capture efficiency test run, in liters or gallons.

D_i is the density of coating, thinner and/or other additive, or cleaning material "i" used in the coating operation during the capture efficiency test run, in kg of material per liter of material or pound of material per gallon of material.

n is the number of different coatings, thinners and/or other additives, or cleaning materials used in the coating operation during the capture efficiency test run.

iv. Method 204D for a temporary total enclosure or 204E for a building enclosure, both in 40 CFR Part 51, Appendix M, shall be used to measure the total mass, kg or pound, of TVH emissions that are not captured by the emission capture system, as they exit the temporary total enclosure or building enclosure during each capture efficiency test run. Substitute TVH for each occurrence of the term volatile organic compounds (VOC) in the methods. Each test run must be at least 3 hours in duration or the length of a production run, whichever is longer, up to 8 hours. If using the building as the enclosure, all organic compound emitting operations inside the building enclosure, other than the coating operation for which the capture efficiency is being determined must be shut down, with all fans and blowers operating normally.

v. Use the following equation to determine the percent capture efficiency of the emission capture system for each capture efficiency test run:

$CE = [(TVH_{used} - TVH_{uncaptured}) / TVH_{used}] \times 100$

CE is the capture efficiency of the emission capture system vented to the thermal oxidizer, in percent.

TVH_{used} is the total mass of TVH liquid input used in the coating operation during the capture efficiency test run, in kg or pound.

$TVH_{uncaptured}$ is the total mass of TVH that is not captured by the emission capture system and that exits from the temporary total enclosure or building enclosure during the capture efficiency test run, in kg or pound.

vi. The capture efficiency of the emission capture system shall be calculated as the average of the capture efficiencies measured in the three test runs.

c. The gas-to-gas protocol compares the mass of TVH emissions captured by the emission capture system to the mass of TVH emissions not captured. To measure the emission capture system efficiency using the gas-to-gas protocol the following procedures shall be followed:

i. The coating operations must be enclosed either by using the building enclosure or by constructing an enclosure around all operations where coatings, thinners and/or other additives, and cleaning materials are applied and any areas following the application where emissions from these applied coatings and thinners/additives and/or cleaning materials subsequently occur (flash-off, curing, and drying areas). Areas where capture devices collect emissions for routing to the thermal oxidizer, such as the entrance and exit areas of an oven or spray booth must also be inside the enclosure. The enclosure must meet the definition of a temporary total enclosure or building enclosure in Method 204 found in 40 CFR Part 51, Appendix M.

ii. Method 204B or 204C in 40 CFR Part 51, Appendix M shall be used to measure the total mass, in kg or pound, of TVH emissions captured by the emission capture system during each capture efficiency test run, as measured at the inlet to the thermal oxidizer. Substitute TVH for each occurrence of the term volatile organic compounds (VOC) in the methods. Each test run must be at least 3 hours in duration or the length of a production run, whichever is longer, up to 8 hours. The sampling points must be upstream from the thermal oxidizer and must represent total emissions routed from the capture system and entering the thermal oxidizer. If multiple emission streams from the capture system enter the thermal oxidizer without a single common duct, then the emissions entering the thermal oxidizer must be simultaneously measured in each duct and the total emissions entering the thermal oxidizer must be determined.

iii. Method 204D for a temporary total enclosure or 204E for a building enclosure, both in 40 CFR Part 51, Appendix M, shall be used to measure the total mass, kg or pound, of TVH emissions that are not captured by the emission capture system, as they exit the temporary total enclosure or

building enclosure during each capture efficiency test run. Substitute TVH for each occurrence of the term volatile organic compounds (VOC) in the methods. Each test run must be at least 3 hours in duration or the length of a production run, whichever is longer, up to 8 hours. If using the building as the enclosure, all organic compound emitting operations inside the building enclosure, other than the coating operation for which the capture efficiency is being determined must be shut down, with all fans and blowers operating normally.

iv. Use the following equation to determine the percent capture efficiency of the emission capture system for each capture efficiency test run:

$$CE = [(TVH_{captured}) / (TVH_{captured} + TVH_{uncaptured})] \times 100$$

CE is the capture efficiency of the emission capture system vented to the thermal oxidizer, in percent.

$TVH_{captured}$ is the total mass of TVH captured by the emission capture system as measured at the inlet to the thermal oxidizer during the emission capture efficiency test run, in kg or pound.

$TVH_{uncaptured}$ is the total mass of TVH that is not captured by the emission capture system and that exits from the temporary total enclosure or building enclosure during the capture efficiency test run, in kg or pound.

v. The capture efficiency of the emission capture system shall be calculated as the average of the capture efficiencies measured in the three test runs.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(3) Compliance with the emission limitation in Section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:
Emissions units K004 through K011 shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).

Applicable Compliance Method:
Compliance with the 95% minimum destruction efficiency (and 100% capture efficiency) shall be demonstrated by the emissions testing requirements in f)(1) and f)(2) above.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

b. Emission Limitations:
Emissions of OC shall not exceed 0.98 lb/hr and 4.29 TPY from coating and cleanup operations for K004 and K005, individually.

Applicable Compliance Method:
The lb/hr limit represents each emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (3.0 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

If required, compliance with the hourly OC emission limitation shall be based on the results of emissions testing conducted in accordance with Methods 1 – 4 and 18, 25, or 25A, as appropriate of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr. and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the minimum destruction efficiency and capture efficiency limitations, compliance with the hourly and annual limitations shall also be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

c. Emission Limitations:
Emissions of OC shall not exceed 0.72 lb/hr and 3.15 TPY, from coating and cleanup operations for K006.

Applicable Compliance Method:
The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (2.20 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the minimum destruction efficiency and capture efficiency limitations, compliance with the hourly and annual limitations shall also be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

d. Emission Limitations:
Emissions of OC shall not exceed 1.14 lbs OC/hr and 4.99 TPY, from coating and cleanup operations for K007 and K008, individually.

Applicable Compliance Method:
The lb/hr limit represents each emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (3.50 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

If required, compliance with the hourly OC emission limitation shall be based on the results of emissions testing conducted in accordance with Methods 1 – 4 and 18, 25, or 25A, as appropriate of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the minimum destruction efficiency and capture efficiency limitations, compliance with the hourly and annual limitations shall also be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

e. Emission Limitations:
Emissions of OC shall not exceed 0.82 lb/hr and 3.59 TPY from coating and cleanup operations for K009.

Applicable Compliance Method:
The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (2.50 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

If required, compliance with the hourly OC emission limitation shall be based on the results of emissions testing conducted in accordance with Methods 1 – 4 and 18, 25, or 25A, as appropriate of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the minimum destruction efficiency and capture efficiency limitations, compliance with the hourly and annual limitations shall also be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

f. Emission Limitations:
Emissions of OC shall not exceed 0.43 lb/hr and 1.88 TPY from coating and cleanup operations for K010.

Applicable Compliance Method:
The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (1.30 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

If required, compliance with the hourly OC emission limitation shall be based on the results of emissions testing conducted in accordance with Methods 1 – 4 and 18, 25, or 25A, as appropriate of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the minimum destruction efficiency and capture efficiency limitations, compliance with the hourly and annual limitations shall also be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

g. Emission Limitations:
Emissions of OC shall not exceed 0.49 lb/hr and 2.15 TPY from coating and cleanup operations for K011.

Applicable Compliance Method:
The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (1.50 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

If required, compliance with the hourly OC emission limitation shall be based on the results of emissions testing conducted in accordance with Methods 1 – 4 and 18, 25, or 25A, as appropriate of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the minimum destruction efficiency and capture efficiency limitations, compliance with the hourly and annual limitations shall also be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

h. Emission Limitation:
Emissions of OC shall not exceed 39.86 TPY fromcoating and cleanup operations for K004-K013 and R003-R004 combined.

Applicable Compliance Method:
Compliance with the combined annual emission limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

i. Emission Limitation:
Emissions of organic HAPs shall not exceed 0.81 kg (6.8 lb) per liter (gal) coating solids used during each 12-month compliance period.

Applicable Compliance Method:
Compliance with the emission limitation above shall be based upon the testing requirements specified in f)(1) and f)(2) and the record keeping requirements specified in d)(2) through d)(9) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group -MACTCoating Lines (Group B): K012, K013,

EU ID	Operations, Property and/or Equipment Description
K012	Tumble and spray bond line
K013	Flange index bond line no. 2 vented to a regenerative thermal oxidizer

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) b)(1)f.; d)(16); d)(17); d)(18); d)(19); and e)(10)b.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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(D) (PTI #P0107521, issued 05-03-2011)	<u>For K012 individually</u>: Emissions of organic compounds (OC) shall not exceed 0.92 pound per hour (lb/hr) and 4.03 tons per year (TPY) from coating and cleanup operations. <u>For K013 individually</u>: Emissions of OC shall not exceed 0.49 lb /hr and 2.15 TPY from coating and cleanup operations. Emissions of OC shall not exceed 39.86 TPY from coating and cleanup from emissions units K004-K013 and R003-R004 combined. See b)(2)a., b)(2)b. and c)(1)
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI #P0107521, issued 05-03-2011)	See b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06 (PTI #P0107521, issued 05-03-2011)	See b)(2)d.
d.	OAC rule 3745-21-09(B)(6)	See b)(2)e.

e.	OAC rule 3745-17-11(C)	See c)(2) and c)(3).
f.	OAC rule 3745-114-01 ORC 3704.03(F)(4)(b)	See d)(16) through d)(19).
g.	40 CFR Part 63, Subpart MMMM (See 40 CFR 63.3880 et seq.) [In accordance with 40 CFR 63.3881, these emissions units are rubber-to-metal coating sources at a miscellaneous metal parts and products surface coating facility.]* *The company has chosen to comply with the emissions limitation for new or reconstructed rubber-to-metal coating sources only, since over half of the miscellaneous metal coating emissions units were installed after August 13, 2002, and all are controlled by one of two RTOs. (See 40 CFR 63.3882(c), (d), and (e), and 40 CFR 63.2.	<u>63.3890(a)(4)</u>: 0.81 kg (6.8 lb) organic hazardous air pollutants (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period See Section B.2. – FACILITY – WIDE TERMS AND CONDITIONS See b)(2)f. through b)(2)j.
h.	40 CFR 63.1-15 (40 CFR 63.3901)	Table 2 to Subpart MMMM of 40 CFR Part 63- Applicability to Subpart MMMM shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE). The federally enforceable emission limitations are based on the operational restriction contained in c)(1) which requires control equipment:

i. 0.92 lb/hr and 4.03 TPY of OC from coating and cleanup operations for emissions unit K012;

ii. 0.49 lb/hr and 2.15 TPY of OC from coating and cleanup operations; and

iii. 39.86 TPY of OC from coating and cleanup from emissions units K004-K013 and R003-R004 combined.

The permittee has committed to reclaim 100% of all cleanup material used resulting in no emissions from cleanup operations [see c)(3)]. Cleanup solvents are only used in the enclosed booths when coating operations have been discontinued. The cleanup operation is a closed loop system using covered paint pots and covered pails to recover the used solvents.

b. A voluntarily request for a grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R003-R004 combined to ease the monitoring and recordkeepingrequirements for these emissions units.

c. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, 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 Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants 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 3745-31-05, the requirements of 3745-31-05(A)(3) as effective 12-1-06 will no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

d. This 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.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the OC emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(D).

e. In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(D).

f. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

The final rules found in 40 CFR Part 63, Subpart MMMM establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for miscellaneous metal parts coating operations. The affected source is the collection of all of the following

operations for or from the surface coating of miscellaneous metal parts and products:

i. all coating operations as defined in 40 CFR 63.3981;

ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee is subject to this NESHAP in accordance with the compliance date specified in 40 CFR 63.3883.

g. The coating operation(s) shall comply with the applicable emission limitation(s) in 40 CFR 63.3890 and the operating limits for the thermal oxidizer (add-on control device) and emission capture system(s) as required by 40 CFR 63.3892 at all times except during periods of startup, shutdown, and malfunction; and the coating operation(s) shall be operated in compliance with the work practice standards in 40 CFR 63.3893 at all times.

h. The permittee shall conduct a performance test according to 40 CFR sections 63.3964, 63.3965, and 63.3966 for each capture system and the thermal oxidizer; and shall establish the operating limits required by 40 CFR 63.3892 and as required by 40 CFR 63.3967 no later than 180 days after the compliance date specified in b)(2)f. above.

i. The permittee shall develop and implement a written startup, shutdown, and malfunction plan (SSMP) by the compliance date of the NESHAP and according to the provisions found in 40 CFR 63.6(e)(3), as follows:

i. The written startup, shutdown, and malfunction plan (SSMP) shall describe, in detail, procedures for operating and maintaining the emissions unit(s) during periods of startup, shutdown, and malfunction.

ii. The plan shall document detailed procedures of corrective action for the malfunction of the process source, the air pollution control equipment, and the monitoring equipment (including CMSs), used to comply with the requirements of this permit and the NESHAP.

iii. The SSMP does not need to address any scenario that would not cause the emissions unit(s) to exceed an applicable emission limitation in the NESHAP.

iv. The SSMP shall address any coating operation equipment that might cause increased emissions or that would affect capture efficiency if the

process equipment malfunctions, such as conveyors that move parts among enclosures.

v. The SSMP shall be written for the following purpose:

(a) to ensure that, at all times, each emissions unit, including the associated air pollution control equipment and monitoring equipment, is maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions;

(b) to ensure that operators are prepared to correct malfunctions as soon as practicable after their occurrence, in order to minimize excess emissions of hazardous air pollutants;

(c) to reduce the reporting burden associated with periods of startup, shutdown, and malfunction; and

(d) to document corrective actions and operating procedures to be taken to restore malfunctioning processes and air pollution control equipment to its normal or usual manner of operation.

vi. The plan shall provide a means to maintain a record of actions (including those conducted to correct a malfunction) taken by the operator during any startup, shutdown, or malfunction event where the emissions unit exceeded an applicable emission limitation, and where actions are consistent with the procedures specified in the SSMP. These records may take the form of a “checklist,” or other effective form of record keeping, that confirms conformance with the SSMP and describes the actions taken during each startup, shutdown, and/or malfunction event. The plan (and checklist, if used) can then be modified to correct or change any sequence of actions and/or equipment settings to help prevent future exceedances of the same limitation for the same reason.

vii. If an/the action(s) taken by the operator during a startup, shutdown, or malfunction event is/are not consistent with the procedures specified in the emissions unit’s SSMP, and the unit’s emissions exceed an applicable emission limitation in the relevant standard (NESHAP), the plan shall require the operator to record the actions taken during each such an event, and shall require the permittee to report (via phone call or FAX) the exceedance and its cause (actions taken) to the regulating agency within 2 working days following the actions conducted that were inconsistent with the plan. The plan shall also require that this notification be followed by a letter, within 7 working days after the end of the event, in accordance with the reporting requirements of this permit (from 40 CFR 63.10(d)(5)(ii)), unless the permittee makes alternative reporting arrangements, in advance, with the Director.

viii. The permittee may use the standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) plan or other similar document to satisfy the requirements for a SSMP, provided the alternative plans meet all the requirements of the permit and the

NESHAP, and the document is available for inspection or is submitted when requested by the Director.

ix. The Director shall require appropriate revisions to the SSMP, if the plan contains one of the following inadequacies:

(a) does not address a startup, shutdown, or malfunction event that has occurred;

(b) fails to provide for the operation of the emissions unit (including associated air pollution control and monitoring equipment) during a startup, shutdown, or malfunction event in a manner consistent with the general duty to minimize emissions;

(c) does not provide adequate procedures for correcting malfunctioning processes and/or air pollution control and monitoring equipment as quickly as practicable; or

(d) includes an event that does not meet the definition of startup, shutdown, or malfunction in 40 CFR 63.2.

63.2 definitions:

Malfunction: means any sudden, infrequent, and not reasonably preventable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner which causes, or has the potential to cause, the emission limitations in an applicable standard to be exceeded. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Shutdown: means the cessation of operation of an affected source or portion of an affected source for any purpose.

Startup: means the setting in operation of an affected source or portion of an affected source for any purpose.

x. The permittee shall periodically review the SSMP, as necessary, to reflect changes in equipment or procedures that would affect the emissions unit's operations. Unless determined otherwise by the Director, the permittee may make revisions to the SSMP without prior approval; however, each such revision to the SSMP shall be reported in the semiannual report, as required in this permit (and 40 CFR 63.10(d)(5)).

xi. If the SSMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall revise the SSMP within 45 days after the event, to include detailed procedures for operating and maintaining the emissions unit using a program of corrective actions for the process source, pollution control equipment, and/or monitoring equipment, and which are to be implemented during any similar malfunction event.

xii. The permittee shall maintain a current SSMP at the facility and shall make the plan available, upon request, for inspection and copying by the Director. If the SSMP is revised, the permittee shall maintain each previous (i.e., superseded) version of the SSMP for a period of 5 years after revision of the plan.

xiii. The record keeping requirements contained in this permit include the required documentation of actions taken during startup, shutdown, and malfunction events.

xiv. The permittee shall document in each semiannual report, that actions taken during each startup, shutdown, and malfunction event, during the relevant reporting period, were either consistent or not consistent with the emissions unit's(s') SSMP.

j. The emission standards set forth in this subpart shall apply at all times except during periods of startup, shutdown, and malfunction. The Director shall determine compliance with the applicable emission limitations, operational restrictions, and/or work practice standards through review and evaluation of required records of operational and maintenance procedures, monitoring data, CPMS evaluations, performance testing results, supporting calculations and emissions data, and any other applicable records required in this permit.

c) Operational Restrictions

(1) The following operational restriction has been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)a.]:

a. Emissions units K012 and K013 shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0107521]

(2) The permittee shall operate the dry filtration systems for the control of particulate emissions whenever emissions units K012 and/or K013 are 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0107521]

(3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI #P0107521]

(4) The permittee shall recover 100% of all cleanup material employed in emissions units K012 and K013.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(5) The permittee shall develop and implement, by the compliance date, a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, additives, and cleaning/purge materials used in the controlled coating operations and the collection, storage, and/or off-site shipment preparations of waste materials generated by the coating operations. The plan shall specify practices and procedures to ensure that, at a minimum, the following elements are implemented:

a. requirements to maintain all organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials in closed containers;

b. procedures to minimize spills of organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials;

c. requirements to move organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials from one location to another in closed containers or pipes;

d. requirements to keep mixing vessels containing organic HAP-containing coatings, thinners, solvent blends, additives, and/or cleaning materials closed, except when adding, removing, or mixing the contents (where a non-automated/non-mechanical mixing system is used); and

e. procedures to minimize emissions of organic HAP during cleaning of storage, mixing, and conveying equipment.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(6) The permittee shall install, operate, and maintain each continuous parameter monitoring system (CPMS) according to the following requirements:

a. the CPMS must complete a minimum of one cycle of operation for each successive 15-minute period of time, with a minimum of four equally-spaced successive cycles of CPMS operation in 1 hour;

b. the CPMS shall maintain a record of the average of all the readings, as required by Table 1 of subpart MMMM, for each successive 3-hour block of time of coating operations for the emission capture system and thermal oxidizer;

c. the results of each inspection, calibration, validation check, and the certification of each CPMS shall be recorded;

d. the CPMS shall be maintained at all times and the necessary parts for routine repairs and maintenance of the monitoring equipment shall be available on site;

e. each CPMS shall be installed to accurately measure the process and/or the control device parameter;

f. verification of the operational status of each CPMS shall include the completion of the manufacturer's written specifications or the recommendations for installation, operation, and calibration of the system;

g. the read out, (the visual display or measured record of the CPMS) or other indication of operation, shall be readily accessible and visible for monitoring and recording by the operator of the equipment;

h. the CPMS, emission capture system(s), thermal oxidizer, and all required parameter data recordings shall be in operation at all times the controlled coating operation is in process, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and zero and span adjustments); and

i. emission capture system and thermal oxidizer parameter data recorded during monitoring malfunctions, associated repairs, out-of-control periods of the monitor or recorder, or required quality assurance or control activities for the CPMS shall not be used in calculating data averages for determining compliance.

A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the CPMS to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calculations is a deviation from the monitoring requirements.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(7) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit (including the associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the Director (appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency), which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or

other standard operating procedures), operation and maintenance records, and inspection of the facility.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(8) The average combustion temperature in the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) in any 3-hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance, and as recommended by the manufacturer until testing.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each coating and cleanup material employed each month for emissions units K004-K013 and R003-R004 combined:

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

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

c. the OC content of each coating and cleanup material employed, as applied, in pounds per gallon;

d. the total controlled OC emission rate for all the coatings and cleanup materials, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance {[summation of d)(1)b. x d)(1)c. (for all coatings and cleanup materials employed] x (1 - over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance]} ; and

e. the annual year-to-date organic compound emissions [sum of d)(1)d. for each month to date from January to December].

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) – (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(2) The permittee shall collect and record the following information each month for this emissions unit [excluding clean-up/purge materials that are 100% reclaimed as described in b)(2)a.]:

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the miscellaneous metal parts coating operation(s), including information from the supplier or manufacturer, formulation data, and/or coating/material testing data;

b. the number of gallons or liters of each coating, thinner/additive and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic HAP for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:

   i. Method 311 from 40 CFR Part 63, Appendix A;

   ii. Method 24 from 40 CFR Part 60, Appendix A if all non-aqueous volatile matter is to be used for the mass fraction of HAP;

   iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pound HAP/gallon of material ÷ pounds/gallon of material, or calculated in kg/liter); or

   iv. solvent blends listed as single components and where neither test data nor manufacturer's data is available, default values from Table 3 to Subpart MMMM or Table 4 if not listed in Table 3, can be used.

e. the volume fraction of coating solids (gallon of coating solids/gallon of coating or liter of coating solids/liter of coating) for each coating applied which can be calculated using one of the following methods:

   i. divide the nonvolatile volume percent, obtained from either ASTM Method D2697-86 ("Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings") or Method D6093-97 ("Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer"), by 100 to convert percent to the volume fraction of coating solids; or

   ii. calculated from: $V_s = 1 - m_{volatiles} / D_{avg}$

   where:

   V_s is the volume fraction of coating solids, in gallon of coating solids/gallon of coating or liter of coating solids/liter of coating;

   $m_{volatiles}$ is the total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined in accordance to Method 24 in Appendix A of 40 CFR Part 60,

in pound of volatile matter per gallon of coating or grams volatile matter per liter of coating;

D_{avg} is the average density of volatile matter in the coating, i.e., pound of volatile matter per gallon of volatile matter or grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98 "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" or from information provided by the supplier or manufacturer, or from reference sources providing density or specific gravity data for pure materials; or

iii. the volume fraction of coating solids can be calculated using information provided by the manufacturer, by using the following information to convert percent by weight to percent by volume, if not provided directly:

(a) for each coating, change the percent by weight solids, percent by weight water, and percent by weight total solvent to the same number of "pounds" or "kilograms" (by assuming 100 pounds {or kg} of coating is applied) and divide each component's assumed weight by its density in the coating, to get the gallons of solids, gallons of water, and gallons of solvent;

(b) add the gallons of solids, gallons of water, and gallons of solvent from (a); and

(c) divide the gallons of solids, from (a) by the sum of the gallons of coating components from (b), to get the volume fraction of coating solids (gallon of coating solids per gallon of coating or liter of coating solids per liter of coating);

f. the total mass of organic HAP (pound or kg) in all of the coatings, thinners/additives, and cleanup/purge materials (as purchased) applied during the month, calculated separately for coatings, thinners/additives, and cleanup/purge materials as follows:

$$HAP = \sum_{i=1}^{r} (VOL_i)(D_i)(W_i)$$

where:

HAP is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials used each month, in pound or kg of HAP for each: 1. the coatings (HAP_c), 2. thinners/additives (HAP_t), and 3. cleanup/purge materials (HAP_{cu})

VOL_i is the volume of material "i" documented in (b) above, in gallons or liters.

D_i is the density of material "i" as documented in (c) above, in pounds/gallon or kg/liter.

W_i is the mass fraction of organic HAP in material "i" as calculated in (d) above, in pound/pound or kg/kg.

r is the number of coatings, the number of thinners/additives, or the number of cleanup/purge materials used during the month, each source (coating, thinner/additive, cleanup/purge) calculated separately for its HAP, and

g. the total mass of organic HAP applied each month in each coating operation, in pound or kg of HAP, calculated as follows:

$$H_{TOT} = HAP_c + HAP_t + HAP_{cu} - R_w$$

where:

H_{TOT} is the total mass of organic HAP applied each month in each coating operation, in pound or kg of HAP, i.e., the sum of the total mass of HAP calculated for each material, above; minus the calculated HAP in recovered materials, R_w, if meeting the requirements for this allowance.

HAP_c is the total mass of organic HAP in all the coatings used during the month, summed from the total mass of HAP calculated from all the coatings applied, as required in (f) above, in pound or kg.

HAP_t is the total mass of organic HAP in all the thinners and additives used during the month, summed from the total mass of HAP calculated from all the thinners/additives applied, as required in (f) above, in pound or kg.

HAP_{cu} is the total mass of organic HAP in all cleanup and purge materials used during the month, summed from the total mass of HAP calculated from all the cleanup/purge materials applied, as required in (f) above, in pound or kg.

R_w is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste treatment, storage, and disposal facility (TSDF) for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to R_w if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for recovery or disposal).

h. the total volume of coating solids applied during the month, calculated as follows:

$$VOL_s = \sum_{h=1}^{m} (VOL_h)(V_h)$$

where:

VOL_s is the total volume of coating solids used during the month, in gallons or liters.

VOL_h is the total volume of coating "h" used during the month, as documented in (b) above, in gallons or liters.

V_h is the volume fraction of coating solids for coating "h", in liter of solids per liter of coating or gallon of solids per gallon of coating, calculated as required in (e) above.

m is the number of coatings applied during the month.

i. the mass of organic HAP emission reduction for the month for the controlled coating operations, using the emissions capture system and the thermal oxidizer control, calculated as follows:

$HAP_{contr} = (A_c + B_t + C_{cu} - R_w - H_{dev}^*)\ (CE/100 \times DRE/100)$

where:

HAP_{contr} is the mass of organic HAP emission reduction for the controlled coating operations (or calculated for each system) during each month, in pound or kg.

* H_{dev} If an operating parameter deviates from that established as required in Table 1 to this subpart or if there is a malfunction of the CPMS equipment or the capture or control devices, the capture and control efficiency shall be assumed to be zero during the period of deviation unless an approval to use other efficiency data is obtained, per 40 CFR 63.3963(c)(2).

A_c is the total mass of organic HAP in the coatings used in the coating operations controlled by the thermal oxidizer collection and control system during the month, calculated as follows:

$$A_c = \sum_{h=1}^{r} (VOL_h)\ (D_h)\ (W_h)$$

where:

A_c is the total mass of organic HAP in the coatings used in the coating operations controlled by the thermal oxidizer during the month, in pound or kg.

VOL_h is the volume of coating "h" used in the coating operations controlled by the thermal oxidizer during the month, in gallons or liters.

D_h is the density of coating "h" used in the coating operations controlled by the thermal oxidizer during the month, in pounds/gallon or kg/liter.

W_h is the mass fraction of organic HAP in coating "h" used in the coating operations controlled by the thermal oxidizer during the month, in pound/pound or kg/kg.

r is the number of coatings used in the coating operations controlled by the thermal oxidizer during the month.

B_t is the total mass of organic HAP in the thinners/additives used in the coating operations controlled by the thermal oxidizer during the month, calculated as follows:

$$B_t = \sum_{j=1}^{q} (VOL_j)(D_j)(W_j)$$

where:

B_t is the total mass of organic HAP in the thinners/additives used in the coating operations controlled by the thermal oxidizer during the month, in pound or kg.

VOL_j is the volume of thinner/additive "j" used in the coating operations controlled by the thermal oxidizer during the month, in gallons or liters.

D_j is the density of thinner/additive "j" used in the coating operations controlled by the thermal oxidizer during the month, in pounds/gallon or kg/liter.

W_j is the mass fraction of organic HAP in thinner/additive "j" used in the coating operations controlled by the thermal oxidizer during the month, in pound/pound or kg/kg.

q is the number of thinners/additives used in the coating operations controlled by the thermal oxidizer during the month.

C_{cu} is the total mass of organic HAP in the cleanup/purge materials used in the coating operations controlled by the thermal oxidizer during the month, calculated as follows:

$$C_{cu} = \sum_{k=1}^{s} (VOL_k)(D_k)(W_k)$$

where:

C_{cu} is the total mass of organic HAP in the cleanup/purge materials used in the coating operations controlled by the thermal oxidizer during the month, in pound or kg.

VOL_k is the volume of cleanup/purge material "k" used in the coating operations controlled by the thermal oxidizer during the month, in gallons or liters.

D_k is the density of cleanup/purge material "k" used in the coating operations controlled by the thermal oxidizer during the month, in pounds/gallon or kg/liter.

W_k is the mass fraction of organic HAP in cleanup/purge material "k" used in the coating operations controlled by the thermal oxidizer during the month, in pound/pound or kg/kg.

s is the number of cleanup/purge materials used in the coating operations controlled by the thermal oxidizer during the month.

R_w is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to R_w if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for recovery or disposal).

H_{dev} is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials applied during all periods of deviation during the month in the controlled coating operation(s), calculated as follows:

$$H_{dev} = \sum_{d=1}^{q} (VOL_d)(D_d)(W_d)$$

where:

H_{dev} is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials applied during all periods of deviation during the month in the controlled coating operation(s), in pound or kg.

VOL_d is the volume of coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in gallons or liters.

D_d is the density of coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in pounds/gallon or kg/liter.

W_d is the mass fraction of organic HAP in coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in pound/pound or kg/kg.

q is the number of different coatings, thinners/additives, and cleanup/purge materials applied during periods of deviation during the month.

CE is the capture efficiency of the emission capture system vented to the thermal oxidizer, in percent.

DRE is the organic HAP destruction efficiency of the thermal oxidizer, in percent.

j. the mass of organic HAP emissions for each month, calculated as follows:

$$HAP_T = [H_2 - \sum_{b=1}^{x}(HAP_{contr,\,b})] + [\sum_{d=1}^{z} H_4]$$

where:

HAP_T is the total mass of organic HAP emissions for the month, in pound or kg.

H_2 and/or H_4 is/are calculated for each coating operation, prior to control, as H_{TOT} in (g) above.

H_2 is the total mass of organic HAP contained in the coatings, thinners/additives, and cleanup materials applied during the month in the controlled coating operations, (H_2 is calculated as the sum of the total mass of HAP from all materials applied in the coating operation(s) controlled by a/the thermal oxidizer, minus the HAP content in any materials collected and sent to a hazardous waste TSDF (R_w) if meeting the requirements for this reduction), in pound or kg.

H_4 is the total mass of organic HAP contained in the coatings, thinners/additives, and cleanup materials applied during the month in any uncontrolled coating operations (H_4 is calculated as the sum of the total mass of HAP from all materials applied in each uncontrolled coating operation, minus the HAP content in any materials collected and sent to a hazardous waste TSDF (R_w) if meeting the requirements for this reduction), in pound or kg.

$HAP_{contr,\,b}$ is the total mass of organic HAP emission reduction for the month, for the thermal oxidizer control for coating operation “b”, calculated as required in (i) above.

x is the number of controlled coating operations where emissions are captured and vented to the thermal oxidizer.

z is the number of coating operations without control.

k. the total organic HAP emission rate for the 12-month compliance period, in pound of HAP per gallon of coating solids applied or kg of HAP per liter of coating solids applied during the rolling, 12-month compliance period, calculated as follows:

$$HAP_{comply} = \sum_{y=1}^{n} (HAP_{T,y}) / \sum_{y=1}^{n} (VOL_{s,\,y})$$

HAP_{comply} is the organic HAP emission rate for the 12-month compliance period, in pound organic HAP emitted per gallon of coating solids applied or kg organic HAP emitted per liter of coating solids applied.

$HAP_{T,\ y}$ is the total mass of organic HAP emissions from all materials used during month y, calculated in (j) above, in pound or kg.

$VOL_{s,\ y}$ is the total volume of coating solids used during month y, calculated in (h) above, in gallons or liters.

y is the identifier for the month.

n is the number of full or partial months in the compliance period; for the initial compliance period, n equals 13 where the compliance date does not fall on the first day of the month; for all following compliance periods n equals 12; and

l. all calculations required above for each monthly rolling, 12-month compliance period.

In order to demonstrate continuous compliance, the organic HAP emission rate for each rolling, 12-month compliance period must be less than or equal to the applicable emission limit in 40 CFR 63.3890. The compliance demonstration shall be conducted on a monthly basis, using the data from the previous 12 months of operation, as documented through the above calculations and records.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(3) The permittee shall also maintain records of the following documentation for all controlled coating operations:

a. a copy of each notification, report, each performance test, supporting documentation, and each rolling, 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP, including the results from each compliance demonstration and records establishing the operating limits during performance testing as required in 40 CFR 63.3892 and as specified in 40 CFR 63.3967;

b. records of the coating operation conditions during the thermal oxidizer organic HAP destruction and/or removal efficiency determination, to document the representative operating conditions during compliance testing;

c. records for establishing the criteria for the permanent total enclosure and the test data documenting that the enclosure used for each capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 and has a capture efficiency or 100%; or

d. records for establishing the criteria for the temporary total enclosure or building enclosure:

i. if using the liquid-to-uncaptured-gas protocol the record shall include:

(a) the mass of total volatile hydrocarbon (TVH) as measured by Method 204A or 204 F of Appendix M to 40 CFR Part 51, for each material used in the coating operation during each capture efficiency test run, including a copy of the test report;

(b) the total TVH for all materials used during each capture efficiency test run, including a copy of the test report;

(c) the mass of TVH emissions not captured, that exited the temporary enclosure or building enclosure during each capture efficiency test run, as measured my Method 204D of 204 E of Appendix M to 40 CFR Part 51, including a copy of the test report; and

(d) records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 for either a temporary total enclosure or a building enclosure;

ii. if using the gas-to-gas protocol the record shall include:

(a) the mass of TVH emissions captured by the emission capture system, as measured by Method 204B or 204C of Appendix M to 40 CFR Part 51, at the inlet to the thermal oxidizer, including a copy of the test report;

(b) the mass of TVH emissions not captured, that exited the temporary enclosure or building enclosure during each capture efficiency test run, as measured my Method 204D of 204 E of Appendix M to 40 CFR Part 51, including a copy of the test report; and

(c) records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 for either a temporary total enclosure or a building enclosure;

e. a record of the work practice plans required per 40 CFR 63.3893 and any operational and maintenance records or inspections that would document the plans are/were implemented on a continuous basis;

f. records pertaining to the design and operation of control and monitoring systems, maintained on site for the life of the equipment;

g. results of each inspection, calibration and validation check, and certification of the continuous parameter monitoring system(s);

h. the average of all recorded readings of the continuous parameter monitoring system(s) for each successive 3-hour period of operation of the emission capture system and thermal oxidizer;

i. the date, time, and duration of each deviation and whether it occurred during a period of startup, shutdown, or malfunction, to include any bypass of the capture and/or add-on control systems;

j. if using the predominant activity alternative under 40 CFR 63.3890(c)(1), records of the data and calculations used to determine the predominant activity;

k. if using the "facility-specific emission limit" alternative under 40 CFR 63.3890(c)(2), data used to calculate the "facility-specific" emission limit; and

l. the records required per 40 CFR 63.6(e)(3), established in the startup, shutdown, and malfunction plan required in this permit.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(4) The permittee shall meet the following requirements for any bypass line to the capture and add-on control system, that could divert emissions from the coating operations to the atmosphere:

a. The valve or closure mechanism controlling the bypass line shall be secured in a nondiverting position, in such a way that the valve or closure mechanism cannot be opened without creating a record documenting that the valve was opened. The method used to monitor or secure the valve or closure mechanism shall meet one of the following requirements:

i. A flow control position indicator shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications. The flow control position indicator shall take a reading at least once every 15 minutes and shall provide a record indicating that the emissions are captured and directed to the thermal oxidizer. The flow indicator shall record the time of the reading, the flow control position, and shall maintain a record of every time the flow direction is changed. The flow control position indicator shall be installed at the entrance to any bypass line that could divert the emissions away from the thermal oxidizer to the atmosphere; or

ii. The bypass line valve shall be secured in the closed position using a car-seal or a lock-and-key. The seal or closure mechanism shall be inspected at least once every month to ensure that the valve is maintained in the closed position and that the emissions from the coating operations are captured and delivered to the thermal oxidizer. A log or record of the monthly inspection shall be maintained and made available to the regulating agency upon request; or

iii. A valve closure monitoring system shall be installed, operated, and maintained to ensure that any bypass line valve is in the closed (nondiverting) position at all times. The valve closure monitoring system shall monitor the valve position at least once every 15 minutes. The monitoring system shall be inspected at least once every month to verify that the monitor correctly indicating valve position. A log or record of the monthly inspection of the valve closure monitoring system shall be maintained and made available to the regulating agency upon request; or

iv. An automatic shutdown system shall be installed, operated, and maintained to shut down the coating operation(s) when air flow is diverted by the bypass line away from the capture system and thermal oxidizer. The automatic shutdown system shall be inspected at least once every month to verify that it will detect diversions of flow and shut down the coating operation(s). A log or record of the monthly inspection of the automatic shutdown system shall be maintained and made available to the regulating agency upon request; or

v. The permittee shall install, calibrate, maintain, and operate a flow direction indicator according to the manufacturer's specifications. The flow direction indicator shall take a reading at least once every 15 minutes and shall provide a record indicating that the emissions are captured and directed to the thermal oxidizer. The flow indicator shall record the time of the reading, the air flow direction, and shall maintain a record of every time the flow direction is changed. The flow direction indicator shall be installed at the entrance to any bypass line that could divert the emissions away from the thermal oxidizer to the atmosphere.

b. If any bypass line is opened, a record shall be created to document reason for the bypass and the length of time it remained open. The deviation shall be included in the semiannual compliance reports as required in 40 CFR 63.3920 and this permit.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(5) The emission capture system shall be installed, operated and maintained according to the following requirements:

a. Each flow measurement device shall meet the following requirements:

i. The flow sensor shall be located in a position that provides a representative flow measurement in the duct from each capture device in the emission capture system to the thermal oxidizer.

ii. Each flow sensor shall have an accuracy of at least 10 percent of the flow.

iii. An initial sensor calibration shall be performed in accordance with the manufacturer's requirements or recommendations.

iv. A validation check shall be performed before initial use or upon relocation or replacement of a sensor. Validation checks include comparison of sensor values with electronic signal simulations or via relative accuracy testing.

v. An accuracy audit shall be conducted every quarter and after every deviation. Accuracy audit methods include comparisons of sensor values with electronic signal simulations or via relative accuracy testing.

vi. Monthly leak checks shall be conducted and a record shall be maintained of the date and the location of each flow measurement device checked. These records shall be made available to the regulating agency upon request.

vii. Quarterly visual inspections shall be conducted for each sensor system and a record shall be maintained of the date and the location of each sensor inspected.

b. Each pressure drop measurement device shall comply with the following requirements:

i. Each pressure sensor device shall be located in or as close to a position that provides a representative measurement of the pressure drop across the opening it was installed to monitor.

ii. Each pressure sensor device shall have an accuracy of at least 0.5 inches of water column or 5 percent of the measured value, whichever is larger.

iii. Each pressure sensor shall initially be calibrated according to the manufacturer's requirements or recommendations.

iv. A validation check shall be conducted before initial operation or upon relocation or replacement of any sensor. Validation checks include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.

v. An accuracy audit shall be conducted every quarter and after every deviation. Accuracy audits include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.

vi. Monthly leak checks shall be conducted on each pressure connection. A pressure of at least 1.0 inches of water column to the connection must yield a stable sensor result for at least 15 seconds. A log or record of the monthly leak checks, to include the date and location of the pressure connection, shall be maintained and made available to the regulating agency upon request.

vii. A monthly visual inspection of each sensor shall be conducted and a log or record of the inspection, to include the date and location, shall be maintained and made available to the regulating agency upon request.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(6) The permittee shall maintain records of the following information for a period of 5 years following the date of each occurrence, measurement, maintenance activity, corrective action, report, and/or record:

a. the occurrence and duration of each startup or shutdown when the startup or shutdown causes the emissions unit to exceed any applicable emission limitation in the NESHAP;

b. the occurrence and duration of each malfunction of operation (i.e., process equipment) and/or the required air pollution control and monitoring equipment;

c. all required maintenance performed on the air pollution control and monitoring equipment, i.e., date, equipment, maintenance activity performed;

d. actions taken during periods of startup and shutdown, when the emissions unit exceeds any applicable emission limitation in the NESHAP, and when these actions are different from the procedures specified in the emissions unit's startup, shutdown, and malfunction plan (SSMP);

e. actions taken during periods of malfunction (of the process, the air pollution control equipment, and/or the monitoring equipment) that are different from the procedures specified in the emissions unit's SSMP;

f. actions taken to demonstrate compliance with the SSMP during periods of startup and/or shutdown, where an applicable NESHAP emission limitation was exceeded; and actions taken during any malfunction (of the process, the air pollution control equipment, and/or the monitoring equipment), where the actions are consistent with the procedures specified in the SSMP*;

g. each period of operation (date and number of hours) during which a/the continuous monitoring system (CMS) is inoperative or is not functioning properly;

h. all required measurements needed to demonstrate compliance with the limitations contained in this permit, including, but not limited to: the 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and any supporting data needed to

demonstrate compliance with the limitations and reporting requirements of the NESHAP;

i. all results of performance tests, CMS performance evaluations, and opacity and visible emission observations;

j. all measurements needed to determine the conditions of performance tests and performance evaluations, including the analysis of samples, determination of emissions, and raw data;

k. all CMS calibration checks;

l. all adjustments and maintenance performed on CMS; and

m. all documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9, and as required in this permit.

*The information needed to demonstrate compliance with the SSMP plan may be recorded using a "checklist" or some other effective form of record keeping, in order to minimize the recording burden for conforming procedures.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(7) The permittee shall maintain the following records for the continuous monitoring system (CMS) in accordance with the general requirements of 40 CFR 63.10(c) as follows:

a. all required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);

b. the date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;

c. the date and time identifying each period during which the CMS was out of control;

d. the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the NESHAP, that occurs during startups, shutdowns, and malfunctions of the emissions unit;

e. the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the NESHAP, that occurs during periods other than startups, shutdowns, and malfunctions of the emissions unit;

f. the nature and cause of any malfunction (if known);

g. the corrective action taken or preventive measures adopted;

h. the nature of the repairs or adjustments to the CMS whenever it/they is/are inoperative or out of control;

i. the total process operating time during the reporting period; and

j. all records of the procedures that are required as part of a quality control program, developed and implemented for the CMS under 40 CFR 63.8(d), as reflected in this permit.

To avoid duplication of records, the permittee may maintain the records for the information in d)(7)f., d)(7)g., and d)(7)h. as part of the SSMP.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(8) If using the allowance for an emission reduction of the uncontrolled/pre-controlled emissions for organic HAP contained in waste materials sent to (or designated for shipment to) a hazardous waste TSDF during the month, the permittee shall maintain records of the following information:

a. the name and address of each hazardous waste TSDF to which waste materials were sent or are scheduled to be sent, and for which an allowance was applied to the calculated uncontrolled/pre-controlled emissions;

b. a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to each hazardous waste TSDF;

c. for each allowance applied in any month:

i. the volume, weight, and source of recovered material collected and an identification of the coating operations producing the waste materials;

ii. the month the allowance was applied and the mass of organic HAP used as the allowance, including the calculations;

iii. the date the recovered material was shipped and its volume and weight (excluding the weight of the container) at the time of shipment to the hazardous waste TSDF and the manifest number accompanying the shipment;

iv. the methodology used to determine the total amount of waste materials collected;

v. the methodology used to determine the mass of organic HAP contained in the wastes, sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment; and

d. for each container of recovered materials shipped to a hazardous waste TSDF, the following records shall be maintained in a log:

i. the date each container was first used and the date of the last addition;

ii. the date and amount of recovered materials added, from first to the last addition;

iii. the date the container was shipped and identification of which hazardous waste TSDF it was shipped to, if more than one facility in (a) above; and

iv. the volume and weight of the material as it was recorded on the waste manifest (minus the weight of the container, if included).

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(9) The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) when the emissions unit is in operation. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee; and shall be capable of accurately measuring the temperature. The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained during the performance test that demonstrated compliance, or below the temperature recommended by the manufacturer until performance testing is completed; and

b. a log of the downtime for the capture (collection) system, thermal oxidizer, and/or monitoring equipment when the associated emissions unit was in operation.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(10) The permittee shall maintain records that document any cleanup operations for K012 and K013 which were not performed as described in b)(2)a.and/or reclaimed as specified in d)(1)e.above.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(11) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(12) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(13) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(14) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(15) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(16) The permit-to-install application for these emissions unit(s), K004-K013, and R001-R004 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the "American Conference of Governmental Industrial Hygienists" (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the "American Conference of Governmental Industrial Hygienists" (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

   TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

   Toxic Contaminant: toluene

   TLV (mg/m3): 188.4

   Maximum Hourly Emission Rate (lbs/hr): 9.43

   Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 287.3

   MAGLC (ug/m3): 4486

The permittee, has demonstrated that emissions of toluene, from emissions unit(s) K004-K013, and R001-R004, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[Authority for term: PTI #P0107521]

(17) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour "maximum ground level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[Authority for term: PTI #P0107521]

(18) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[Authority for term: PTI #P0107521]

(19) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[Authority for term: PTI #P0107521]

e) Reporting Requirements

(1) The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R003-R004, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(2) The permittee shall submit an initial notification of compliance status report no later than 30 calendar days following the end of the initial compliance period (documented in the "Additional Terms and Conditions" section of this permit). The initial notification of compliance shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of the compliance method for each coating operation, i.e., if using "compliant materials"; the capture and control device(s) employed and the estimated or demonstrated efficiency of each; and a statement as to if cleanup solvents were collected for recovery or disposal and if they were shipped to a certified hazardous waste TSDF;

e. statement of whether the affected source achieved the emission limitations for the initial compliance period;

f. if there was a deviation during the initial compliance period, a description of the deviation and statement of the cause and the calculations of emissions used to determine noncompliance with the applicable limitation(s);

g. calculations and supporting documentation for the coatings, thinners, and cleanup materials applied (information from supplier or manufacturer or summary of testing results) and waste materials sent to a hazardous waste TSDF, if used, to include the following:

i. mass fraction of organic HAP for one coating, one thinner and/or other additive, and one cleanup/purge material;

ii. the volume fraction of coating solids for one coating;

iii. density for one coating, one thinner and/or other additive, and one cleanup/purge material; and

iv. the average amount of waste materials collected in any month and average mass of organic HAP contained in the waste materials sent off-site to a hazardous waste TSDF;

h. for coating operations meeting the emissions limitation without add-on controls, the calculations of the total organic HAP emission rate for the 12-month compliance period, from the coatings, thinners/additives, and cleaning materials used each month, to include:

i. the calculations of the total volume of coating solids used each month;

ii. the calculations of the total mass of organic HAP emissions for each month; and

iii. the calculation of the initial 12-month organic HAP emission rate;

i. for coating operations meeting the emissions limitation with add-on controls the calculations of the total organic HAP emission rate for the 12-month compliance period, from the coatings, thinners/additives, and cleaning materials used each month, to include:

i. the calculations of the total volume of coating solids used each month;

ii. the calculations of the mass of organic HAP emission reduction for each month for the emission capture systems and thermal oxidizers;

iii. the calculations of the total mass of organic HAP emissions for each month; and

iv. the calculation of the initial 12-month organic HAP emission rate;

j. information for the add-on-controls and capture system:

i. a summary of the data and copies of the calculations supporting the determination that each emissions capture system is a permanent total enclosure or a measurement of the emission capture system's efficiency, including the protocol/procedures followed;

ii. a summary of the results of each capture efficiency test and performance test conducted for the thermal oxidizer; and

iii. a list of each emission capture system's and thermal oxidizer's operating limits and summary of the data used to establish these parameter limitations;

k. a statement of whether or not the work practice plan was developed and implemented;

l. if using the predominant activity alternative under 40 CFR 63.3890(c)(1), the data and calculations used to determine the predominant activity; and

m. if using the "facility-specific emission limit" alternative under 40 CFR 63.3890(c)(2), the calculation of the "facility-specific" emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(3) The permittee shall submit semiannual compliance reports which shall be postmarked or delivered no later than July 31 and January 31 following the end of each semiannual reporting period. The reporting period is each 6-month period of time ending on June 30 and December 31 of each year. The semiannual compliance reports shall cover the previous 6 months of operation, and each monthly compliance calculation shall be based on the records from the previous (rolling) 12 months of operation. The semiannual report shall contain the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);

c. the date of the report and the beginning and ending dates of the reporting period;

d. identification of the compliance method for each coating operation;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period;

g. if using the predominant activity alternative according to 40 CFR 63.3890(c)(1), the annual determination of predominant activity if it was not included in the previous semi-annual compliance report;

h. if using the "facility-specific emission limit" alternative according to 40 CFR 63.3890(c)(2), the calculation of the "facility-specific" emission limit for each 12-month compliance period during the 6-month reporting period;

i. if there were no deviations from the emission limitations in 63.3890, the operating limits in 40 CFR 63.3892, or the work practice standards in 40 CFR 63.63.3893, a statement that there were no deviations from the emissions limitations during the reporting period;

j. if there were no periods of operation during which the continuous parameter monitoring system(s) (CPMS) was/were out-of-control, as specified in 40 CFR 63.8(c)(7), a statement that there were no periods of time when the CPMS was/were out-of-control during the reporting period; and

k. if there were any deviations during the compliance period, from the controlled coating operation, the report shall include the following information:

i. the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;

ii. any periods of time when emissions bypassed the thermal oxidizer and were diverted to the atmosphere;

iii. the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including the total mass of organic HAP emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

iv. if applicable, the calculation used to determine mass of organic HAP in waste materials;

v. the calculation of the total volume of coating solids used each month, as required in this permit;

vi. the calculation of the mass of organic HAP emission reduction each month by emission capture systems and thermal oxidizers, as required in this permit;

vii. the calculation of the total mass of organic HAP emission rate each month of deviation and the 12-month emission rate, as required in this permit, in kg (or lb) of organic HAP per liter (or gallon) of coating solids applied;

viii. the date and time that each malfunction started and stopped;

ix. a brief description of the continuous parameter monitoring system (CPMS);

x. the date of the latest CPMS certification or audit;

xi. the date(s) and time that each CPMS was inoperative, except for zero/low-level and high-level checks;

xii. the date(s), time, and duration (start and end dates and hours) that each CPMS was out-of-control and the corrective actions taken, per 40 CFR 63.8(c)(8);

xiii. the date, time, and duration of each deviation from any operating limit(s) contained in this permit, from Table 1 to this subpart, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period;

xiv. the date, time, and duration of any bypass of the thermal oxidizer, and whether each deviation occurred during a period of startup, shutdown, or malfunction, or during another period;

xv. a summary of the total duration of each deviation from an operating limit in Table 1 to this subpart during the semiannual reporting period, and the total duration as a percent of the total source operating time during the semiannual reporting period;

xvi. a summary of each bypass of the thermal oxidizer during the semiannual reporting period, and the total duration as a percent of the total source operating time during the semiannual reporting period;

xvii. a breakdown of the total duration of the deviations from the operating limits established as required in Table 1 to this subpart and any bypasses of the thermal oxidizer during the semiannual reporting period into those that were due to startup, shutdown, control equipment problems, process problems, and other known or unknown causes;

xviii. a summary of the total duration of CPMS downtime during the semiannual reporting period, and the total duration of the CPMS downtime as a percent of the total source operating time during the semiannual reporting period;

xix. a description of any changes in the CPMS, coating operation emission capture system, or thermal oxidizer since the last semiannual reporting period;

xx. for each deviation from the work practice standards, a description of the deviation, the date and time period of the deviation, and the action taken to correct the deviation; and

xxi. a statement of the cause of each deviation.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(4) The permittee shall include the following information in the semiannual report for any monthly record where the allowance for an emission reduction was applied in the uncontrolled/pre-controlled HAP emissions calculations for materials that were shipped (or scheduled to be shipped) to a hazardous waste TSDF:

a. any monthly record where measurements were not taken or appropriate records were not maintained for recovered material(s) that were applied as an emission reduction in the calculated HAP emissions before add-on controls and used to demonstrate compliance with the NESHAP and the limitations in this permit;

b. any record of recovered solvent that was not finally shipped to a hazardous waste TSDF and/or was shipped to a TSDF not regulated under 40 CFR Parts 262, 264, 265, or 266 and which was also applied as an emission reduction to HAP emissions prior to add-on controls;

c. any record of discrepancy between the total volume or weight of material(s) collected and the total volume shipped to a hazardous waste TSDF, as documented in the recovered materials log;

d. any record of recovered material being applied more than one time in a monthly compliance demonstration; and/or

e. a miscalculation of the HAP emission reduction calculation for recovered materials sent to a hazardous waste TSDF.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(5) The permittee shall include startup, shutdown, and malfunction reports in the semiannual report if actions taken by the permittee during a startup, shutdown, and/or malfunction are consistent with the procedures specified in the facility startup, shutdown, and malfunction plan. The startup, shutdown, and/or malfunction report shall consist of a letter containing the name of the responsible official and his certification that all startup, shutdown, or malfunction events were conducted according to the plan.

If actions taken during any startup, shutdown, or malfunction were not consistent with the startup, shutdown, and malfunction plan, the permittee shall submit immediate startup, shutdown, and/or malfunction reports as follows:

a. If actions taken during any startup, shutdown, or malfunction were not consistent with the startup, shutdown, and malfunction plan, the permittee shall submit immediate startup, shutdown, and/or malfunction reports as follows:

b. unless alternative arrangements are made, within 7 working days after the end of the event, a letter shall be sent to the appropriate Ohio EPA District Office or local air agency and it shall contain:

i. the name, title, and signature of the responsible official who is certifying the accuracy of the report,

ii. an explanation of the circumstances of the event, i.e., the reasons for not following the startup, shutdown, and malfunction plan; and

iii. if any excess emissions and/or parameter monitoring exceedances have occurred.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(6) The permittee shall immediately report a startup, shutdown, and/or malfunction event to the regulating agency when either of the following scenarios occur:

a. actions taken by the permittee/operator during a startup or shutdown cause the emissions unit(s) to exceed an emission limitation from the NESHAP and procedures specified in the SSMP are not followed; and/or

b. actions taken during a malfunction are not consistent with the procedures specified in the SSMP.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(7) The immediate report shall consist of a telephone call (or facsimile {FAX} transmission) to the Director within 2 working days after commencing actions inconsistent with the plan, and it shall be followed by a letter, delivered or postmarked within 7 working days after the end of the event. The written report shall contain:

a. the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy;

b. the explanation of the circumstances of the event;

c. the reasons for not following the SSMP;

d. description of all excess emissions and/or parameter monitoring exceedances which are believed to have occurred (or could have occurred in the case of malfunctions); and

e. actions taken to minimize emissions in conformance with 40 CFR 63.6(e)(1)(i) and as required in this permit.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(8) Performance test results for the emission capture system(s) and thermal oxidizer(s) shall be submitted no later than 30 days after completion of the performance test(s). Results of each performance test shall include the analysis of samples, determination of emissions, and the supporting raw data. Performance testing results shall be retained for a minimum of 5 years from the test date and shall be made available to the Director, or representative of the Director, upon request.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(9) The permittee shall identify in the semiannual reports all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained and established during the most recent performance test that demonstrated compliance.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

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

a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any

documented modifications made by the permittee) when the emissions unit(s) was/were in operation; and

b. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31, April 30, July 31, and October 31, and shall cover the previous calendar quarters unless an alternative schedule has been established and approved by the Director (Ohio EPA, Northwest District Office).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

(11) The permittee shall notify the Director (Ohio EPA, Northwest District Office) in writing of any daily record showing that cleanup operations which were not performed as described in b)(2)b.i. and/or reclaimed as specified in c)(3) above. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northwest District Office) within 30 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(12) 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.

[Authority for term: Authority for term: OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for emissions units R003, R004, and K004 through K013 in accordance with the following requirements:

a. The emissions testing shall be conducted within 6 months after issuance of this permit, and every 2.5 years thereafter, unless otherwise approved by the Ohio EPA, Northwest District Office..

b. The emission testing shall be conducted in order to determine the capture efficiency of each emission capture system vented to the thermal oxidizer(s) and the destruction efficiency of the thermal oxidizer(s), both in percent.The current configuration of the source is such that either of two RTOs may be used to control emissions. The permittee shall test any RTO which is going to be used under normal operating conditions (i.e. excluding start-up, shutdown or malfunction) to show compliance with the terms and conditions of this permit.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. Method 1 of 1A of Appendix A to 40 CFR Part 60, to select sampling sites and velocity traverse points;

ii. Method 2, 2A, 2C, 2D, 2F or 2G of Appendix A to 40 CFR Part 60, as appropriate, to measure gas volumetric flow rate;

iii. Method 3, 3A, or 3B of Appendix A to 40 CFR Part 60, as appropriate, for gas analysis to determine dry molecular weight;

iv. Method 4 of Appendix A to 40 CFR Part 60, to determine stack gas moisture;

v. Method 25 or 25A, to determine the total gaseous organic mass emissions as carbon at the inlet and outlet of the thermal oxidizer, simultaneously, using:

(a) Method 25 if testing an oxidizer with expected carbon concentrations to exceed 50 ppm

(b) Method 25A if testing an oxidizer with expected carbon concentrations to be 50 ppm or less, or if the control is not an oxidizer; and

vi. Method 204 A through 204F (appropriate method) of Appendix M to 40 CFR Part 51 to determine the capture efficiency.

d. The test(s) shall be conducted while the emissions unitsare operating at or near maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The total gaseous organic emissions mass flow rates shall be determined at the inlet and the outlet of the thermal oxidizer for each of the 3 test runs.

f. The total gaseous organic emissions mass flow rates shall be determined at the inlet and the outlet of the thermal oxidizer for each of the 3 test runs.

$M_f = Q_{sd}\ C_c\ (12)\ (0.0416)\ (10^{-6})$

where:

M_f is the total gaseous organic emissions mass flow rate, in kg/hr.

Q_{sd} is the volumetric flow rate of gases entering or exiting the thermal oxidizer, as determine by Method 2, 2A, 2C, 2D, 2F or 2G, in dscm/hour.

C_c is the concentration of organic compounds as carbon in the vent gas, as determined by Method 25 or 25A, in parts per million by volume on a dry basis (ppmv).

0.0416 is the conversion factor for molar volume, Kg-moles per cubic meter (mol/m^3) @ 293 degrees Kelvin and 760 mmHg.

g. For each test run the thermal oxidizer's organic emissions destruction efficiency shall be calculated as follows:

$DRE = [(M_{fi} - M_{fo}) / M_{fi}] \times 100$

where:

DRE is the organic emissions destruction efficiency of the thermal oxidizer, in percent.

M_{fi} is the total gaseous organic emissions mass flow rate at the inlet(s) to the thermal oxidizer, from the equation above, in kg/hour.

M_{fo} is the total gaseous organic emissions mass flow rate at the outlet(s) to the thermal oxidizer, from the equation above, in kg/hour.

The emission destruction or removal efficiency of the thermal oxidizer shall be the average of the efficiencies determined in the three test runs.

h. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

i. Personnel from the appropriate Ohio EPA District Office or local air agency 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.

j. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(2) The permittee shall conduct a performance test of each emission capture system when operating at a representative flow rate and when the thermal oxidizer is operating at a representative inlet concentration. The capture efficiency of each emission capture system shall be determined using one of the following methods. If the capture system does not meet the criteria for a permanent total enclosure in (a) below, the permittee shall determine the capture efficiency of each emissions capture system for the coating

operations using either the "liquid-to-uncaptured-gas protocol" in (b) or the "gas-to-gas protocol" in (c) below:

a. The capture system efficiency can be assumed to be 100% if both of the following conditions are met:

   i. the capture system meets the criteria in Method 204 found in 40 CFR Part 51, Appendix M for a permanent total enclosure and all the exhaust gases from the enclosure are directed to the thermal oxidizer.

   ii. all coatings, thinners and or other additives, and cleaning materials used in the coating operation are applied within the capture system; coating solvent flash-off, curing, and drying occurs within the capture system; and the removal or evaporation of cleaning materials from the surfaces they are applied to occurs within the capture system.

b. The liquid-to-uncaptured-gas protocol compares the mass of liquid total volatile hydrocarbon (TVH) in materials used in the coating operation to the mass of TVH emissions not captured by the emission capture system. To measure the emission capture system efficiency using the liquid-to uncaptured gas protocol the following procedures shall be followed:

   i. The coating operations must be enclosed either by using the building enclosure or by constructing an enclosure around all operations where coatings, thinners and/or other additives, and cleaning materials are applied and any areas following the application where emissions from these applied coatings and thinners/additives and cleaning materials subsequently occur (flash-off, curing, and drying areas). Areas where capture devices collect emissions for routing to the thermal oxidizer, such as the entrance and exit areas of an oven or spray booth must also be inside the enclosure. The enclosure must meet the definition of a temporary total enclosure or building enclosure in Method 204 found in 40 CFR Part 51, Appendix M.

   ii. Method 204A or 204F in 40 CFR Part 51, Appendix M shall be used to determine the mass fraction of TVH liquid input from each coating, thinner and/or other additive, and cleaning material used in the coating operation during each capture efficiency test run. Substitute TVH for each occurrence of the term volatile organic compounds (VOC) in the methods. Each test run must be at least 3 hours in duration or the length of a production run, whichever is longer, up to 8 hours.

   iii. Calculate the total mass of TVH liquid input from all coatings, thinners and/or additives, and cleaning materials used in the coating operation during each capture efficiency test run as follows:

$$TVH_{used} = \sum_{i=1}^{n} (TVH_i)(VOL_i)(D_i)$$

where:

TVH_{used} is the mass of liquid TVH in the materials used in the coating operation during the capture efficiency test run, in kg or pound.

TVH_i is the mass fraction of TVH in coating, thinner and/or other additive, or cleaning material "i" that is used in the coating operation during the capture efficiency test run, in kg of TVH per kg material or pound of TVH per pound material.

VOL_i is the total volume of coating, thinner and/or other additive, or cleaning material "i" used in the coating operation during the capture efficiency test run, in liters or gallons.

D_i is the density of coating, thinner and/or other additive, or cleaning material "i" used in the coating operation during the capture efficiency test run, in kg of material per liter of material or pound of material per gallon of material.

n is the number of different coatings, thinners and/or other additives, or cleaning materials used in the coating operation during the capture efficiency test run.

iv. Method 204D for a temporary total enclosure or 204E for a building enclosure, both in 40 CFR Part 51, Appendix M, shall be used to measure the total mass, kg or pound, of TVH emissions that are not captured by the emission capture system, as they exit the temporary total enclosure or building enclosure during each capture efficiency test run. Substitute TVH for each occurrence of the term volatile organic compounds (VOC) in the methods. Each test run must be at least 3 hours in duration or the length of a production run, whichever is longer, up to 8 hours. If using the building as the enclosure, all organic compound emitting operations inside the building enclosure, other than the coating operation for which the capture efficiency is being determined must be shut down, with all fans and blowers operating normally.

v. Use the following equation to determine the percent capture efficiency of the emission capture system for each capture efficiency test run:

$$CE = [(TVH_{used} - TVH_{uncaptured}) / TVH_{used}] \times 100$$

CE is the capture efficiency of the emission capture system vented to the thermal oxidizer, in percent.

TVH_{used} is the total mass of TVH liquid input used in the coating operation during the capture efficiency test run, in kg or pound.

$TVH_{uncaptured}$ is the total mass of TVH that is not captured by the emission capture system and that exits from the temporary total enclosure or building enclosure during the capture efficiency test run, in kg or pound.

vi. The capture efficiency of the emission capture system shall be calculated as the average of the capture efficiencies measured in the three test runs.

c. The gas-to-gas protocol compares the mass of TVH emissions captured by the emission capture system to the mass of TVH emissions not captured. To measure the emission capture system efficiency using the gas-to-gas protocol the following procedures shall be followed:

i. The coating operations must be enclosed either by using the building enclosure or by constructing an enclosure around all operations where coatings, thinners and/or other additives, and cleaning materials are applied and any areas following the application where emissions from these applied coatings and thinners/additives and/or cleaning materials subsequently occur (flash-off, curing, and drying areas). Areas where capture devices collect emissions for routing to the thermal oxidizer, such as the entrance and exit areas of an oven or spray booth must also be inside the enclosure. The enclosure must meet the definition of a temporary total enclosure or building enclosure in Method 204 found in 40 CFR Part 51, Appendix M.

ii. Method 204B or 204C in 40 CFR Part 51, Appendix M shall be used to measure the total mass, in kg or pound, of TVH emissions captured by the emission capture system during each capture efficiency test run, as measured at the inlet to the thermal oxidizer. Substitute TVH for each occurrence of the term volatile organic compounds (VOC) in the methods. Each test run must be at least 3 hours in duration or the length of a production run, whichever is longer, up to 8 hours. The sampling points must be upstream from the thermal oxidizer and must represent total emissions routed from the capture system and entering the thermal oxidizer. If multiple emission streams from the capture system enter the thermal oxidizer without a single common duct, then the emissions entering the thermal oxidizer must be simultaneously measured in each duct and the total emissions entering the thermal oxidizer must be determined.

iii. Method 204D for a temporary total enclosure or 204E for a building enclosure, both in 40 CFR Part 51, Appendix M, shall be used to measure the total mass, kg or pound, of TVH emissions that are not captured by the emission capture system, as they exit the temporary total enclosure or building enclosure during each capture efficiency test run. Substitute TVH for each occurrence of the term volatile organic compounds (VOC) in the methods. Each test run must be at least 3 hours in duration or the length of a production run, whichever is longer, up to 8 hours. If using the building as the enclosure, all organic compound emitting operations inside the building enclosure, other than the coating operation for which the capture efficiency is being determined must be shut down, with all fans and blowers operating normally.

iv. Use the following equation to determine the percent capture efficiency of the emission capture system for each capture efficiency test run:

$CE = [(TVH_{captured}) / (TVH_{captured} + TVH_{uncaptured})] \times 100$

CE is the capture efficiency of the emission capture system vented to the thermal oxidizer, in percent.

$TVH_{captured}$ is the total mass of TVH captured by the emission capture system as measured at the inlet to the thermal oxidizer during the emission capture efficiency test run, in kg or pound.

$TVH_{uncaptured}$ is the total mass of TVH that is not captured by the emission capture system and that exits from the temporary total enclosure or building enclosure during the capture efficiency test run, in kg or pound.

v. The capture efficiency of the emission capture system shall be calculated as the average of the capture efficiencies measured in the three test runs.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

(3) Compliance with the emission limitation in Section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:
Emissions units K012 and K013 shall be vented to a regenerative thermal oxidizer capable of achieving a minimum destruction efficiency of 95% (100% capture).

Applicable Compliance Method:
Compliance with the 95% minimum destruction efficiency (and 100% capture efficiency) shall be demonstrated based on the results of the emissions testing requirements in f)(1) and f)(2) above.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

b. Emission Limitations:
Emissions of OC shall not exceed 0.92 lb/hr and 4.03 TPY from coating and cleanup operations for K012.

Applicable Compliance Method:
The hourly emission limitation represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (2.80 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

If required, compliance with the hourly OC emission limitation shall be based on the results of emissions testing conducted in accordance with Methods 1 – 4 and 18, 25, or 25A, as appropriate of 40 CFR Part 60, Appendix A.
The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the

minimum destruction efficiency and capture efficiency limitations, compliance with the hourly and annual limitations shall also be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

c. Emission Limitations:
Emissions of OC shall not exceed 0.49 lb/hr and2.15 TPY from coating and cleanup operations for K013.

Applicable Compliance Method:
The hourly emission limitation represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (1.50 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

If required, compliance with the hourly OC emission limitation shall be based on the results of emissions testing conducted in accordance with Methods 1 – 4 and 18, 25, or 25A, as appropriate of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the minimum destruction efficiency and capture efficiency limitations, compliance with the hourly and annual limitations shall also be demonstrated.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

d. Emission Limitations:
Emissions of OC shall not exceed 39.86 TPY, from coating and cleanup operations for K004-K013 and R003-R004 combined.

Applicable Compliance Method:
Compliance with the annual combined emission limitation above shall be based upon the record keeping requirements specified in d)(1) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI #P0107521]

e. Emission Limitation:
Emissions of organic HAPs shall not exceed 0.81 kg (6.8 lb) per liter (gal) coating solids used during each 12-month compliance period.

Applicable Compliance Method:
Compliance with the emission limitation above shall be based upon the testing requirements specified in f)(1) and f)(2) and the record keeping requirements specified in d)(2) through d)(9) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart MMMM, and PTI #P0107521]

g) Miscellaneous Requirements

(1) None.