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

Certified Mail

11/23/2011

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

Larry Helyes
Liverpool Coil Processing
880 STEEL DRIVE
VALLEY CITY, OH 44280

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1652000062
Permit Number: P0108649
Permit Type: Renewal
County: Medina

Dear Permit Holder:

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

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: ARAQMD

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Liverpool Coil Processing

Facility ID:	1652000062
Permit Number:	P0108649
Permit Type:	Renewal
Issued:	11/23/2011
Effective:	11/23/2011
Expiration:	11/23/2021

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Liverpool Coil Processing

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Authorization

Facility ID: 1652000062
Application Number(s): A0042612
Permit Number: P0108649
Permit Description: Permit renewal for a metal coil laminating line with no emission control device
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 11/23/2011
Effective Date: 11/23/2011
Expiration Date: 11/23/2021
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Liverpool Coil Processing
880 Steel Drive
Valley City, OH 44280

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

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

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0108649
Permit Description: Permit renewal for a metal coil laminating line with no emission control device

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

Emissions Unit ID:	**K001**
Company Equipment ID:	Laminating Line
Superseded Permit Number:	16-02405
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. K001, Laminating Line

Operations, Property and/or Equipment Description:

Metal coil laminatingline consisting of an IR oven, UV oven, two 3 MMBtu/hrindirect-fired ovens, roll-coater, spot welder, and re-oiler.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), PTI 16-02405 issued 06/21/2005	2.6 poundsof volatile organic compounds (VOC) per hour from coatings, excluding cleanup materials, and 15 tons of VOC per year from coatings and cleanup materials, combined Emissions from natural gas combustion in the two indirect-fired ovens, combined, shall not exceed the following: 0.50 pound of carbon monoxide (CO) per hourand 2.20 tons of COper year 0.60 pound of nitrogen oxides (NO_X) per hour and 2.60 tons of NO_X per year 0.12 pound ofparticulate emissions (PE) per hour and 0.53 ton of PE per year 0.004 pound of sulfur dioxide (SO_2)per

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		hourand 0.02 ton of SO_2 per year 0.03 pound of VOCper hour and 0.10 ton of VOC per year VisiblePE from any stack shall not exceed 5% opacity, as a 6-minute average See b)(2)a., b)(2)b., and c)(1)
b.	OAC rule 3745-17-07(A)	See b)(2)c.
c.	OAC rule 3745-17-10(B)(1)	0.020 pound of PE per million British thermal unit (MMBtu) of actual heat input See c)(1)
d.	OAC rule 3745-21-09(E)	2.6 pounds of VOC per gallon of coating, excluding water and exempt solvents

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) include compliance with the requirements of OAC rule 3745-17-10 and OAC rule 3745-21-09(E).

b. The hourly and annual CO, NO_X, PE, VOC, and SO_2 emission limitations from natural gas combustion regulated per OAC rule 3745-31-05(A)(3) are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these limits.

c. The requirements of this rule are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) The permittee shall use only natural gas as fuel in the two, 3 MMBtu/hrindirect-fired ovens.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for the line:

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

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

c. the VOC emission factor for coatings that polymerize, in pounds of VOC emitted per pound of VOC employed;

d. the number of gallons of each coating employed;

e. the VOC emission rate from all coatings employed, in pounds per day (i.e., the sum of d)(1)b. times d)(1)d. for all coatings that do not polymerize plus the sum of d)(1)b. times d)(1)c. times d)(1)d. for all coatings that polymerize);

f. the total number of hours the emissions unit was in operation excluding time for cleanup; and

g. the average hourly VOC emissions rate for all coatings, in pounds per hour (i.e., d)(1)e. divided by d)(1)f.).

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

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

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

c. the VOC emission rate from all coatings employed, in tons per month;

d. the name and identification number of each cleanup material;

e. the VOC content of each cleanup material, in pounds per gallon;

f. the VOC emission rate from all cleanup materials employed, in tons per month; and

g. the total VOC emission rate from all coatings and cleanup materials employed, in tons per month (i.e., d)(2)c. plusd)(2)f.).

(3) The permit-to-install and operate (PTIO) application for this emissions unit, K001, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit 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, (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 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 then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., "X" hours per day and "Y" 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 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: Acrylic Acid
TLV (mg/m3): 5.89
Maximum Hourly Emission Rate (lbs/hr): 0.35
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 78.9
MAGLC (ug/m3): 140

Toxic Contaminant: Isopropanol
TLV (mg/m3): 491.3
Maximum Hourly Emission Rate (lbs/hr): 0.822
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 185.3
MAGLC (ug/m3): 11,698

The permittee has demonstrated that emissions of acrylic acid and isopropanol from emissions unit P001 is calculated to be less than eighty per cent of theMAGLC; 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).

(4) Prior to making any physical changes to or changes in the method of operation of the emissions unit that could impact the parameters or values 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 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, which was modeled from the initial (or last) application; and

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

If the permittee determines that the “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 a change meets the definition of a “modification”, the permittee shall apply for and obtain a final PTIO prior to the change. The Director (appropriate Ohio EPA district office or local air agency) 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 may require the permittee to submit a permit application for the increased emissions.

(5) 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 toxics modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the 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 runs that established the predicted 1-hour maximum ground level concentration, which demonstrated the emissions unit 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 or the materials applied.

(6) 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.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate Ohio EPA district office or local air agency.

(2) The permittee shall notify the Director of any monthly record showing the use of noncomplying coatings. A copy of such record shall be sent to the Director (appropriate Ohio EPA district office or local air agency) within 30 days following the end of the calendar month.

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

The permittee shall include in the PER 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. If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

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

2.6 lbsVOC/hr from coatings, excluding cleanup materials

15 tons VOC/yr from coatings and cleanup materials, combined

<u>Applicable Compliance Method</u>:

Compliance with the hourly and annual VOC emissions limitations identified above shall be demonstrated by the monitoring and recordkeeping requirements specified in sections d)(1) and d)(2).

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

0.50 lb CO/hr and 2.20 tons of CO/yr from natural gas combustion

<u>Applicable Compliance Method</u>:

Compliance with the hourly CO emission limitation indentified above shall be demonstrated by multiplying an emission factor of 84 pounds of CO per million standard cubic feet (84 lbs CO/10^6scf) of natural gas fired (AP-42 Table 1.4-1,

July 1998) by a conversion factor of 1 pound per 1,020 million British thermal units (1 lb/1,020 MMBtu) and the combined maximum hourly natural gas usage.

The annual emissions limitation was established by multiplying the hourly allowable emissions limitation by 8,760 hours per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be ensured provided compliance is maintained with the hourly limitation.

c. Emission Limitation:

0.60 lb NO_X/hr and 2.60 tons NO_X/yr from natural gas combustion

Applicable Compliance Method:

Compliance with the hourly NO_X emission limitation indentified above shall be demonstrated by multiplying an emission factor of 100 pounds of NO_X per million standard cubic feet (100 lbs $NO_X/10^6$scf) of natural gas fired (AP-42 Table 1.4-1, July 1998) by a conversion factor of 1 pound per 1,020 million British thermal units (1 lb/1,020 MMBtu) and the combined maximum hourly natural gas usage.

The annual emissions limitation was established by multiplying the hourly allowable emissions limitation by 8,760 hours per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be ensured provided compliance is maintained with the hourly limitation.

d. Emission Limitation:

0.12 lb PE/hr and 0.53 ton PE/yr from natural gas combustion

Applicable Compliance Method:

Compliance with the hourly PE emission limitation indentified above shall be demonstrated by multiplying the allowable emission factor of 0.020pound of PE per million British thermal unit (0.020 lb PE/MMBtu) of actual heat input by the combined maximum hourly heat input.

The annual emissions limitation was established by multiplying the hourly allowable emissions limitation by 8,760 hours per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be ensured provided compliance is maintained with the hourly limitation.

e. Emission Limitation:

0.004 lb SO_2/hr and 0.02 ton SO_2/yr from natural gas combustion

Applicable Compliance Method:

Compliance with the hourly SO_2 emission limitation indentified above shall be demonstrated by multiplying an emission factor of 0.6 pound of SO_2 per million standard cubic feet (0.6lb $SO_2/10^6$scf) of natural gas fired (AP-42 Table 1.4-1, July 1998) by a conversion factor of 1 pound per 1,020 million British thermal units (1 lb/1,020 MMBtu) and the combined maximum hourly natural gas usage.

The annual emissions limitation was established by multiplying the hourly allowable emissions limitation by 8,760 hours per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be ensured provided compliance is maintained with the hourly limitation.

f. Emission Limitation:

0.03 lb VOC/hr and 0.10 ton VOC/yr from natural gas combustion

Applicable Compliance Method:

Compliance with the hourly VOC emission limitation indentified above shall be demonstrated by multiplying an emission factor of 5.5 pounds of VOC per million standard cubic feet (5.5lbsVOC/10^6scf) of natural gas fired (AP-42 Table 1.4-1, July 1998) by a conversion factor of 1 pound per 1,020 million British thermal units (1 lb/1,020 MMBtu) and the combined maximum hourly natural gas usage.

The annual emissions limitation was established by multiplying the hourly allowable emissions limitation by 8,760 hours per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be ensured provided compliance is maintained with the hourly limitation.

g. Emission Limitation:

Visible PE from any stack shall not exceed 5% opacity, as a 6-minute average

Applicable Compliance Method:

If required, compliance with the opacity limitation identified above shall be determined in accordance with the procedures specified in OAC rule 3745-17-03(B)(1).

h. Emission Limitation:

0.020 lb PE/MMBtu of actual heat input

Applicable Compliance Method:

If required, compliance with the lbPE/MMBtu emissions limitation identified above shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-17-03(B)(9).

i. Emission Limitation:

2.6 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the lbs VOC/gallon emission limitation identified above shall be demonstrated by the monitoring and recordkeeping requirements specified in section d)(2), and in accordance with the procedures of OAC rule 3745-21-10(B).

Pursuant to OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use U.S. EPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24.

g) Miscellaneous Requirements

(1) None.