



Environmental Protection Agency

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

1/6/2012

Certified Mail

Mr. George Frahn
Comfort Line Ltd.
5500 Enterprise Blvd
Toledo, OH 43216

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0448011664
Permit Number: P0108883
Permit Type: Administrative Modification
County: Lucas

Dear Permit Holder:

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

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification
TDES; Michigan; Indiana; Canada



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Comfort Line Ltd. Is a manufacturer of extruded plastics operating in Lucas County. The facility is a major source of HAPs (styrene) and is permitted as a Title V source. Comfort Line requested a modification of their Title V permit to incorporate the requirements of OAC 3734-21-25 (RPC RACT rule), and incorporate new particulate matter control and operating requirements. During the review of the Title V permit it was determined that a modification to the BAT determination of the 2009 permit to install P0104626 would be required to comply with the 7/2/2010 OEPA guidance for the issuance of BAT determinations under the SB265 action for emissions units K001, K002 and P014.

P0105966 is the most recent PTI containing the main coating line (K001), the custom coating line (K002). P014 will be modified under P0108795. K001 and K002 will require a review of the PO104626 BAT determination as they are relatively small sources with maximum emissions of some pollutants anticipated to be less than 10 tons per year.

3. Facility Emissions and Attainment Status:

There is a 90 TPY federally enforceable plant-wide limit on VOC emissions at this facility. All other pollutants are emitted in minor quantities. Lucas county is not classified or is in attainment status for all criteria air pollutants.

4. Source Emissions:

P0105966 did not modify the established BAT in P0104626:

The K002 determination contained no BAT. K001 included a BAT determination of 15.0 pounds per hour and 65.7 tons per year VOC from coatings, and 104.9 pounds per month and 0.63 ton per year VOC from clean-up materials.

K001 Main Coating Line

The permittee's application indicates that only plastic products are coated at a maximum application rate of 5.0 gallons per hour of a 3 pounds VOC per gallon coating. The coating is reported to contain a worst case 64.28% solids content and is applied by a HVLP gun. We will use 10 pounds per gallon as a worst case solids content.

$$\begin{aligned} PE_{\text{Coating}} &= [\text{coating usage rate (gallons/hr)}] \times [\text{Solids content (lb solids/gallon coating)}] \times (1-\text{transfer eff}) \times \\ & (1-\text{control eff}) \\ &= (5.0 \text{ gallons/hr})(10.0 \text{ lbs solid/gallon coating})(1-0.55)(1-0.99) = 0.23 \text{ lb/hr} \\ & 0.23 \text{ lb/hr (8760 hr/yr)/(2000 lb/t)} = 1.0 \text{ ton PE/yr} \end{aligned}$$



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0108883
Facility ID: 0448011664

$$\begin{aligned} \text{VOC}_{\text{Coating}} &= [\text{coating usage rate (gallons/hr)}] \times [\text{VOC content (lbs/gallon)}] \\ &= (5.0 \text{ gallons/hr})(3.0 \text{ lbs/gallon}) = 15.0 \text{ lbs VOC/hr} \\ 15.0 \text{ lb/hr (8760 hr/yr)} / (2000 \text{ lb/t}) &= 65.7 \text{ tpy VOC} \end{aligned}$$

A restriction on OC was included in P0104626 based on existing requirements under the now defunct 21-07 rules. There is no requirement to set a restriction for clean-up solvent related emissions under OAC rule 3745-31-05 as the VOC emitted from coatings is greater (i.e., since hourly coating emissions are higher than the hourly cleanup emissions, the coating restriction represents the worst case rate of VOC emissions for PTE purposes). Therefore the clean-up restrictions will be removed from the permit.

K002 Custom Coating Line

The permittee's application indicates that only plastic products are coated at a maximum application rate of 0.24 gallons per hour of a 3 pounds VOC per gallon coating. The coating is reported to contain a worst case 62.5% solids content and is applied by a HVLP gun. We will use 10 pounds per gallon as a worst case solids content.

$$\begin{aligned} \text{PE}_{\text{Coating}} &= [\text{coating usage rate (gallons/hr)}] \times [\text{Solids content (lb solids/gallon coating)}] \times (1 - \text{transfer eff}) \times (1 - \text{control eff}) \\ &= (0.24 \text{ gallons/hr})(10.0 \text{ lbs solid/gallon coating})(1 - 0.55)(1 - 0.99) = 0.01 \text{ lb/hr} \\ 0.01 \text{ lb/hr (8760 hr/yr)} / (2000 \text{ lb/t}) &= 0.05 \text{ ton PE/yr} \end{aligned}$$

$$\begin{aligned} \text{VOC}_{\text{Coating}} &= [\text{coating usage rate (gallons/hr)}] \times [\text{VOC content (lbs/gallon)}] \\ &= (0.24 \text{ gallon/hr})(3.0 \text{ lbs/gallon}) = 0.72 \text{ lb VOC/hr} \\ 0.72 \text{ lb/hr (8760 hr/yr)} / (2000 \text{ lb/t}) &= 3.20 \text{ tpy VOC} \end{aligned}$$

5. Conclusion:

This permit modification does not substantially change the 2009 permit determination and should be issued draft/final as non-controversial.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	1.05 (no increase)
VOC	68.9 (no increase)

PUBLIC NOTICE
1/6/2012 Issuance of Draft Air Pollution Permit-To-Install

Comfort Line Ltd.
5500 Enterprise Blvd,
Toledo, OH 43612
Lucas County

FACILITY DESC.: All Other Plastics Product Manufacturing

PERMIT #: P0108883

PERMIT TYPE: Administrative Modification

PERMIT DESC: Administrative modification to bring the Chapter 31 determination of the 2009 PTI into conformity with the BAT guidance of 7/2/2010 during the company requested updating of the Title V permit.

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: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Danny Pittman, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
Comfort Line Ltd.**

Facility ID:	0448011664
Permit Number:	P0108883
Permit Type:	Administrative Modification
Issued:	1/6/2012
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Comfort Line Ltd.

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 7
9. Reporting Requirements 7
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 9
14. Public Disclosure 9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 10
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 14
1. K001, Main Paint Line 15
2. K002, Custom Paint Line 30

Authorization

Facility ID: 0448011664
Facility Description: Manufacture of extruded plastics
Application Number(s): M0001413
Permit Number: P0108883
Permit Description: Administrative modification to bring the Chapter 31 determination of the 2009 PTI into conformity with the BAT guidance of 7/2/2010 during the company requested updating of the Title V permit.
Permit Type: Administrative Modification
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 1/6/2012
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Comfort Line Ltd.
5500 Enterprise Blvd
Toledo, OH 43612

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

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

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0108883

Permit Description: Administrative modification to bring the Chapter 31 determination of the 2009 PTI into conformity with the BAT guidance of 7/2/2010 during the company requested updating of the Title V permit.

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

Emissions Unit ID:

Company Equipment ID:
Superseded Permit Number:
General Permit Category and Type:

K001

Main Paint Line
P0105966
Not Applicable

Emissions Unit ID:

Company Equipment ID:
Superseded Permit Number:
General Permit Category and Type:

K002

Custom Paint Line
P0105966
Not Applicable



A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

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

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Toledo Department of Environmental Services.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Toledo Department of Environmental Services. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Toledo Department of Environmental Services every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Toledo Department of Environmental Services concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. **Best Available Technology**

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

8. **Air Pollution Nuisance**

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

9. **Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Toledo Department of Environmental Services.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission

limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Toledo Department of Environmental Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently

removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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



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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

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

a) None.

2. The combined emissions of Volatile Organic Compounds (VOC) from all emission units at this facility shall not exceed 90.00 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The combined emissions of VOC shall include the following emission units: K001, K002, P001, P002, P003, P004, P005, P006 and P014.

3. The permittee shall collect and record the following information monthly for the purpose of determining compliance with the rolling, 12-month VOC emission limitation:

a) for K001, K002 and P014:

- (1) the company identification for each coating material employed;
- (2) the number of gallons of each coating, as employed;
- (3) the organic compound content of each coating, as employed, in pounds per gallon;
- (4) the total VOC emission rate for all coatings employed calculated as a summation of a)(2) x a)(3) for all coatings, in pounds per month;

b) for P001:

- (1) the company identification of each resin employed;
- (2) the weight of each resin employed in pounds;
- (3) the VOC content of each resin employed (e.g. styrene), in percent by weight;
- (4) the total VOC emission rate for all resin employed calculated as the summation of b)(2) x b)(3) for all resins multiplied by the emissions factor of 0.01 pound VOC per pound of available VOC content (AP-42 Chapter 6.4, Table 6.4-1 dated 1/95), in pounds per month;

c) for P002, P003, P004, P005 and P006:

- (1) the company identification of each resin employed;
- (2) the weight of each resin employed in pounds;
- (3) the VOC content of each resin employed (e.g. styrene), in percent by weight;
- (4) the total VOC emission rate for all resin employed calculated as the summation of c)(2) x c)(3) for all resins multiplied by the emissions factor of 0.04 pound VOC per pound of available VOC content (AP-42 Chapter 6.4, Table 6.4-1 dated 1/95), in pounds per month;

- d) for all emissions units facility-wide:
 - (1) the company identification for each cleanup material employed;
 - (2) the volume of each cleanup material applied in gallons;
 - (3) the VOC content of each cleanup material applied in pounds per gallon;
 - (4) the total VOC emission rate for all clean-up materials employed calculated as a summation of d)(2) x d)(3) for all cleanup materials, in pounds per month;
 - e) the monthly VOC emissions rate from all emissions units, calculated as a summation of the total VOC emissions rates from all coatings, resins and clean-up materials recorded above divided by 2000 pounds per ton, in tons per month; and
 - f) the rolling, 12-month summation of the VOC emissions, calculated by adding the current month's VOC emissions from all emission units at this facility to the VOC emissions for the preceding eleven calendar months from all emission units at this facility, in tons.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC. These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions, of this permit.

C. Emissions Unit Terms and Conditions



1. K001, Main Paint Line

Operations, Property and/or Equipment Description:

Main Coating Line for fiberglass reinforced pultruded styrene resin with particulate control by a dry filter system.

- 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.	ORC 3704.03(T)	<p>Volatile organic compound (VOC) emissions from coatings employed shall not exceed 15.0 pounds per hour and 65.7 tons per rolling, 12-month period.</p> <p>The requirements of this rule also include compliance with 40 CFR Part 63 Subpart PPPP.</p>
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.23 pound per hour and 0.99 ton per year.</p> <p>See b)(2)a. and b)(2)b.</p>
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See b)(2)c.
d.	<p>40 CFR Part 63 Subpart PPPP (40 CFR 63.4480 through 63.4581)</p> <p>[In accordance with 40 CFR 63.4481, this emissions unit is an existing surface coating operation at a major HAP source subject to the emissions limitations/control measures specified in this section.]</p>	<p>Organic hazardous air pollutants (HAP) emissions from all coating operations onsite shall not exceed 0.16 pound of organic HAP emissions per pound of coating solids applied during each 12-month compliance period.</p> <p>See b)(2)d.</p>



e.	40 CFR Part 63 Subpart A (40 CFR 63.1 to 63.16)	See b)(2)e.
f.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 6-minute average.
g.	OAC rule 3745-17-11(C)(1),(C)(2)	See b)(2)f. and b)(2)g.

(2) Additional Terms and Conditions

- a. The hourly and annual particulate emission limitations reflect the potential to emit for this emissions unit while maintaining compliance with OAC rule 3745-17-11(C) by the use of a dry fabric filtration system. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not 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, then these emission limits/control measures no longer apply..
- c. The following terms and conditions apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
 - i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this source since the calculated annual emissions rate for PE is less than 10 tons per year taking into account the federally enforceable control requirements under OAC rule 3745-17-11(C).
 - d. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart PPPP.

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

- i. all coating operations as defined in 40 CFR 63.4581;
- 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, using the "compliant material" option, shall not apply any coating in the coating operation(s) with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.4551 and 63.4552 for the compliance period.

If the permittee chooses to use the "compliant coating option" for any coating or a group of coatings, in order to demonstrate compliance with this NESHAP, such coating operation(s) shall not apply any coating with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual material, used within a group of materials applied in the "compliant coating operation", exceeds the emission limitation for that coating group; or a thinner, additive, or cleaning/purge material containing an organic HAP is applied, the mass average organic HAP content for the coating operations must be calculated as required in this permit.

For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.4490 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.4551 and 63.4552.

- e. Table 2 to 40 CFR Part 63, Subpart PPPP shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- f. The permittee shall control the particulate emissions (PE) from the coating operations of emissions unit with a dry filtration system, or equivalent, and shall comply with the work practice requirements of OAC rule 3745-17-11(C)(2)(a) through (g).
- g. In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any

modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

c) **Operational Restrictions**

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (3) Every individual coating used in the "compliant coating operations" must meet the emission limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. Any coating operation meeting these limitations, for each material applied, shall not be required to meet the operating limits in 40 CFR 63.4492 or work practice standards in 40 CFR 63.4493.
- (4) 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.

- (5) If the permittee can meet the emission limitation(s) contained in 40 CFR 63.4490 without add-on controls, by calculating the rolling, 12-month HAP emission rate at the end of

each month, the permittee shall not be required to meet the operating limits contained in 40 CFR 63.4492 or work practice standards contained in 40 CFR 63.4493.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) 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.
- (2) 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.
- (3) 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.
- (4) 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.

- (5) 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.
- (6) The permittee shall collect and record daily the following information for the coating operation:
 - a. the company identification for each coating and reduction solvent.

- b. the number of gallons of each coating employed for each day, as applied, while the associated oven (P014) was in operation;
 - c. the number of gallons of each coating employed for each day, as applied, while the associated oven (P014) was NOT in operation;
 - d. the volatile organic compound content of each coating employed, in pounds per gallon as applied;
 - e. the total volatile organic compound emission rate for all coatings while the associated oven (P014) was in operation, in pounds per day (b. x d.);
 - f. the total volatile organic compound emission rate for all coatings while the associated oven (P014) was NOT in operation, in pounds per day (c. x d.);
 - g. the total number of hours the emissions unit was in operation each day; and
 - h. the average hourly rate of VOC emissions ((e. + 0.95 f.) ÷ g), in pounds per hour;
 - i. the monthly total VOC emissions rate, calculated as a monthly summation of the daily VOC emissions rates recorded in e. and f. divided by 2000 pounds per ton, in tons per month; and
 - j. the rolling, 12 month summation of VOC emissions, in tons.
- (7) The permittee shall collect and record the following information each month for this emissions unit when utilizing the compliant coatings option:
- 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 plastic 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 meets the limits contained in 40 CFR 63.4490 and that each thinner, additive, and cleanup material applied in the plastic 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 nonaqueous volatile matter is to be used for the mass fraction of HAP; or
 - 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);
- e. the mass fraction of coating solids (pound of coating solids/pound of coating or kg of coating solids /kg coating) for each coating applied, determined using one of the following methods:
- i. Method 24 from 40 CFR Part 60, Appendix A; or
 - ii. information from the supplier or manufacturer of the coatings, where the mass fraction of coating solids can be calculated from the density and the mass of solids per gallon of each material (pound solids/gallon of coating pounds/gallon of coating, or calculated in kg/kg);
- f. the organic HAP content of each coating, in pound of organic HAP emitted per pound of coating solids used or kg of organic HAP emitted per kg of coating solids used, calculated as follows for each coating applied in the plastic parts coating operations using the "compliant material" option:

$$H_c = W_c / S_c$$

where:

H_c is the organic HAP content of coating "c", in kg organic HAP emitted per kg of coating solids used or pound of organic HAP emitted per pound of coating solids used.

W_c is the mass fraction of organic HAP in coating "c", kg HAP per kg coating or pound of HAP per pound of coating, as determined in (d) above.

S_c is the mass fraction of coating solids in coating "c", kg coating solids per kg coating or pound of coating solids per pound of coating, as determined in (e) above; and

- g. all calculations required by this permit for each rolling 12-month compliance period.

In order to demonstrate continuous compliance, the calculated organic HAP content (H_c) for each coating used must be less than or equal to the applicable emission limit in 40 CFR 63.4490; and each thinner and/or other additive, and cleaning material used during the each 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 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.

*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.

- (8) The permittee shall collect and record the following information each month for this emissions unit when utilizing the "without add-on controls" option:
- 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 plastic 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 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 nonaqueous 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 PPPP or Table 4 if not listed in Table 3, can be used.
 - e. the mass fraction of coating solids (pound of coating solids/pound of coating or kg of coating solids /kg coating) for each coating applied determined using one of the following methods:
 - i. Method 24 from 40 CFR Part 60, Appendix A; or

Effective Date: To be entered upon final issuance

- ii. information from the supplier or manufacturer of the coatings, where the mass fraction of coating solids can be calculated from the density and the mass of solids per gallon of each material (pound solids/gallon of coating pounds/gallon of coating, or calculated in kg/kg);
- 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:

$$\text{HAP} = \sum ((\text{VOL}_i) (D_i) (W_i))$$

where:

sum is from $i=1$ to $i=r$

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.

- g. the total mass of organic HAP emissions for each month, calculated as follows:

$$\text{HAPTOT} = \text{HAP}_c + \text{HAP}_t + \text{HAP}_{cu} - R_w$$

where:

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

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 mass of coating solids applied during the month, calculated as follows:

$$M_s = \sum (VOL_h) (D_h) (M_h)$$

where:

sum is from h=1 to h=m

M_s is the total mass of coating solids used during the month, in pound or kg.

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

D_h is the density of coating "h", as documented in c. above, in pounds/gallon or kg/liter.

M_h is the mass fraction of coating solids for coating "h", pound of solids per pound of coating or kg of solids per kg coating, calculated as required in e. above.

m is the number of coatings applied during the month.

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

$$HAP_{comply} = \sum (HAPTOT, y) / \sum (M_s, y)$$

where:

sum is from y=1 to y=n

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

HAPTOT, y is the total mass of organic HAP emissions from all materials used during month y, calculated in g. above, in pound or kg.

M_s , y is the total mass of coating solids used during month y , calculated in h . above, in pound or kg.

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

- j. 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 63.4490. 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.

- (9) The permittee shall maintain records to demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable limitation contained in this NESHAP and permit; and that no thinner, additive, and/or cleanup/purge material used in the coating operations contains organic 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. Each record shall be maintained for 5 years following the date of application of the coating.
- (10) The permittee shall also maintain the following records for the plastic parts coating line:
- a. a copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.4490 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;
 - b. if using the predominant activity alternative under 40 CFR 63.4490(c)(1), the records of the data and calculations used to determine the predominant activity;
 - c. if using the "facility-specific" emission limit under 40 CFR 63.4490(c)(2), the data used to calculate the "facility-specific" emission limit; and
 - d. the date, time, and duration of use, and the amount of any material applied in the compliant coating operations that did not meet the requirements of the "compliant material" option.

If demonstrating compliance with a predominant activity determination or a "facility-specific" emission limit, all coating operations included in the predominant activity

determination or calculation of the "facility-specific" emission limit must comply with the applicable limit and requirements for the "compliant material" option.

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.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - 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;
 - b. any exceedance of VOC emission limits for coating, and the amount of such exceedance; and
 - c. if no deviations, report no deviations.
- (2) The permittee shall submit semiannual reports no later than July 31 or January 31 following the end of each semiannual reporting period (June 30 or December 31).
 - 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 as either the "compliant material" option or the "without add-on control" option;
 - 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 for the uncontrolled coating operations or the limitation from 40 CFR 63.4490 for each type of compliant coating applied;
 - g. if using the predominant activity alternative according to 40 CFR 63.4490(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 63.4490(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, a statement that there were no deviations from the emissions limitations during the reporting period; and
 - j. if there were any deviations during the compliance period, the report shall include the following information:
 - i. if using the "compliant material" option the report shall include:
 - (a) an identification of each coating used that deviated from the applicable emission limit, and each thinner/additive, and cleaning material used that contained organic HAP and the dates and times each was used;
 - (b) the calculation of the organic HAP content for each coating that deviated from the applicable limit, kg (lb) organic HAP per liter (gallon) of coating solids;
 - (c) the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation; and
 - (d) a statement of the cause of each deviation;
 - ii. deviations from coating applications without add-on control shall include the following information:
 - (a) the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;
 - (b) the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);
 - (c) if applicable, the calculation used to determine mass of organic HAP in waste materials; and
 - (d) a statement of the cause of each deviation.
- (3) The permittee shall identify in the semiannual reports any period of time where a coating was applied that exceeded the organic HAP content limitation contained in this NESHAP and/or a 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.

- (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.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:
- 15.0 pounds of VOC per hour.
- Applicable Compliance Method:
- Compliance shall be determined by dividing the daily VOC emissions by the number of actual hours that the emissions unit was in operation that day for both when the associated oven (P014) was in operation and when NOT in operation.
- The emissions calculated when P014 is in operation shall be "split" between this emissions unit and P014, with 95% of the emissions applied to this emission unit.
- b. Emission Limitation:
- 65.7 tons of VOC per rolling, 12-month period.
- Applicable Compliance Method:
- The annual emissions limitation was based on the hourly limit (15.0 pounds per hour) multiplied by 8760 hours per year and divided by 2000 pounds per ton. Therefore, compliance with the hourly emission limitation serves as demonstration of compliance for the annual emission limitation.
- c. Emission Limitation:
- VE shall not exceed 20% opacity of visible PE, as a 6-minute average.
- Applicable Compliance Method:
- Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
- d. Emission Limitation:
- 0.23 pound of PE per hour.

Applicable Compliance Method:

If requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(10).

e. Emission Limitation:

0.99 ton of PE per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable particulate emission limitation (0.23 pound per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

f. Emission Limitation:

0.16 pound of HAP per pound of coatings solids

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods set forth in 40 CFR 63 Subpart PPPP under the "compliant coatings" or "emission rate without add-on controls" options, as appropriate.

g) Miscellaneous Requirements

- (1) When the associated drying oven (P014) is operating, for purposes of calculating the organic compound emission rates for this emissions unit and the associated oven (P014), the permittee shall utilize a value of 95% as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from the emissions unit. The remaining 5% of the organic compounds employed in this emissions unit shall be considered to be the uncontrolled emissions for the associated oven. This split of organic compound emissions between this emissions unit and the associated oven is based upon the amount reported in application.



2. K002, Custom Paint Line

Operations, Property and/or Equipment Description:

Custom Coating Line for fiberglass reinforced pultruded styrene resin with particulate control by a dry filter system.

- 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), as effective 11/30/01	Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.01 pound per hour and 0.05 ton per rolling, 12-month period. The emissions of volatile organic compounds from the coatings employed in this emissions unit shall not exceed 0.72 pound per hour as a daily average, and 3.20 tons per rolling, 12-month period. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See b)(2)c.
c.	OAC rule 3745-31-05(F), as effective 12/1/06	The emissions of volatile organic compounds from the coatings employed in this emissions unit shall not exceed 0.72 pound per hour as a daily average, and 3.20 tons per rolling, 12-month period. See b)(2)d.
d.	40 CFR Part 63 Subpart PPPP (40 CFR 63.4480 through 63.4581) [In accordance with 40 CFR 63.4481, this emissions unit is an	Organic HAP emissions from all coating operations onsite shall not exceed 0.16 pound of organic HAP emissions per pound of coating solids applied during each 12-month compliance period.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	existing surface coating operation at an area source subject to the emissions limitations/control measures specified in this section.]	See b)(2)e.
e.	40 CFR Part 63 Subpart A (40 CFR 63.1 through 63.16)	See b)(2)f.
f.	OAC rule 3745-17-07(A)(1)	Visible emissions (VE) from this emissions unit shall not exceed 20% opacity as a 6-minute average.
g.	OAC rule 3745-17-11(C)(1),(C)(2)	See b)(2)g. and b)(2)h.

(2) Additional Terms and Conditions

- a. The hourly and annual particulate emission limitations reflect the potential to emit for this emissions unit while maintaining compliance with OAC rule 3745-17-11(C) by the use of a dry fabric filtration system. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not 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, then these emission limits/control measures no longer apply.
- c. The following terms and conditions apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
 - i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminate source since the calculated annual emissions rate for PE is less that 10 tons per year taking into account the federally enforceable control requirements under OAC rule 3745-17-11(C).
- d. The following terms and conditions apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

- i. Permit to Install P0108883 for this air contaminate source takes into consideration the following voluntary restrictions (including the use of any applicable air pollution equipment), as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).
 - (a) a maximum coating application rate of 0.24 gallon per hour, and
 - (b) a maximum VOC content of 3 pounds per gallon coating.
- e. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart PPPP.

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

- i. all coating operations as defined in 40 CFR 63.4581;
- 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 shall be subject to the requirements and limitations of this NESHAP on December 5, 2007, at which time the initial compliance period begins for the coating operations; and the initial compliance period ends on December 30, 2008.

The permittee, using the "compliant material" option, shall not apply any coating in the coating operation(s) with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.4551 and 63.4552 for the compliance period.

If the permittee chooses to use the "compliant coating option" for any coating or a group of coatings, in order to demonstrate compliance with this NESHAP, such coating operation(s) shall not apply any coating with an organic HAP content

greater than or equal to the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual material, used within a group of materials applied in the "compliant coating operation", exceeds the emission limitation for that coating group; or a thinner, additive, or cleaning/purge material containing an organic HAP is applied, the mass average organic HAP content for the coating operations must be calculated as required in this permit.

For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.4490 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.4551 and 63.4552.

- f. Table 2 to 40 CFR Part 63, Subpart PPPP shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- g. The permittee shall control the particulate emissions (PE) from the coating operations of emissions unit with a dry filtration system, or equivalent, and shall comply with the work practice requirements of OAC rule 3745-17-11(C)(2)(a) through (g).
- h. In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (3) Every individual coating used in the "compliant coating operations" must meet the emission limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. Any coating operation meeting these limitations, for each material applied, shall not be required to meet the operating limits in 40 CFR 63.4492 or work practice standards in 40 CFR 63.4493.
- (4) 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.

- (5) If the permittee can meet the emission limitation(s) contained in 40 CFR 63.4490 without add-on controls, by calculating the rolling, 12-month HAP emission rate at the end of each month, the permittee shall not be required to meet the operating limits contained in 40 CFR 63.4492 or work practice standards contained in 40 CFR 63.4493.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) 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.
- (2) 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.
- (3) 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.

- (4) 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.

- (5) 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.
- (6) The permittee shall collect and record monthly the following information for the coating operation:
- a. The company identification for each coating and reduction solvent;
 - b. the number of gallons of each coating employed, as applied;
 - c. the volatile organic compound content of each coating employed, in pounds per gallon as applied;
 - d. The total number of hours the emissions unit was in operation each month;
 - e. the average hourly rate of coating usage ($(\sum b.) \div d.$), in gallons per hour.
- (7) The permittee shall collect and record the following information each month for this emissions unit when utilizing the compliant coating option:
- 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 plastic 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 meets the limits contained in 40 CFR 63.4490 and that each

thinner, additive, and cleanup material applied in the plastic 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 nonaqueous volatile matter is to be used for the mass fraction of HAP; or
 - 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);
- e. the mass fraction of coating solids (pound of coating solids/pound of coating or kg of coating solids /kg coating) for each coating applied, determined using one of the following methods:
 - i. Method 24 from 40 CFR Part 60, Appendix A; or
 - ii. information from the supplier or manufacturer of the coatings, where the mass fraction of coating solids can be calculated from the density and the mass of solids per gallon of each material (pound solids/gallon of coating pounds/gallon of coating, or calculated in kg/kg);
- f. the organic HAP content of each coating, in pound of organic HAP emitted per pound of coating solids used or kg of organic HAP emitted per kg of coating solids used, calculated as follows for each coating applied in the plastic parts coating operations using the "compliant material" option:

$$H_c = W_c / S_c$$

where:

H_c is the organic HAP content of coating "c", in kg organic HAP emitted per kg of coating solids used or pound of organic HAP emitted per pound of coating solids used.

W_c is the mass fraction of organic HAP in coating "c", kg HAP per kg coating or pound of HAP per pound of coating, as determined in d. above.

Sc is the mass fraction of coating solids in coating "c", kg coating solids per kg coating or pound of coating solids per pound of coating, as determined in e. above; and

- g. all calculations required by this permit for each rolling 12-month compliance period.

In order to demonstrate continuous compliance, the calculated organic HAP content (Hc) for each coating used must be less than or equal to the applicable emission limit in 40 CFR 63.4490; and each thinner and/or other additive, and cleaning material used during the each 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 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.

*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.

- (8) The permittee shall collect and record the following information each month for this emissions unit when utilizing the "without add-on controls" option:
- 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 plastic 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 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 nonaqueous 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 PPPP or Table 4 if not listed in Table 3, can be used.
- e. the mass fraction of coating solids (pound of coating solids/pound of coating or kg of coating solids /kg coating) for each coating applied determined using one of the following methods:
 - i. Method 24 from 40 CFR Part 60, Appendix A; or
 - ii. information from the supplier or manufacturer of the coatings, where the mass fraction of coating solids can be calculated from the density and the mass of solids per gallon of each material (pound solids/gallon of coating pounds/gallon of coating, or calculated in kg/kg);
- 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:

$$\text{HAP} = \sum ((\text{VOL}_i) (D_i) (W_i))$$

where:

sum is from $i=1$ to $i=r$

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.

- g. the total mass of organic HAP emissions for each month, calculated as follows:

$$\text{HAPTOT} = \text{HAP}_c + \text{HAP}_t + \text{HAP}_{cu} - R_w$$

where:

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

HAPc 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.

HAPt 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.

HAPcu 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.

Rw 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 Rw 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 mass of coating solids applied during the month, calculated as follows:

$$Ms = \sum (VOLh) (Dh) (Mh)$$

where:

sum is from h=1 to h=m

Ms is the total mass of coating solids used during the month, in pound or kg.

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

Dh is the density of coating "h", as documented in c. above, in pounds/gallon or kg/liter.

Mh is the mass fraction of coating solids for coating "h", pound of solids per pound of coating or kg of solids per kg coating, calculated as required in (e) above.

m is the number of coatings applied during the month.

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

$$HAP_{comply} = \sum (HAPTOT, y) / \sum (Ms, y)$$

where:

sum is from $y=1$ to $y=n$

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

HAPTOT, y is the total mass of organic HAP emissions from all materials used during month y , calculated in g. above, in pound or kg.

M_s, y is the total mass of coating solids used during month y , calculated in h. above, in pound or kg.

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

- j. 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 63.4490. 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.

- (9) The permittee shall maintain records to demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable limitation contained in this NESHAP and permit; and that no thinner, additive, and/or cleanup/purge material used in the coating operations contains organic 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. Each record shall be maintained for 5 years following the date of application of the coating.
- (10) The permittee shall also maintain the following records for the plastic parts coating line:
- a copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.4490 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;
 - if using the predominant activity alternative under 40 CFR 63.4490(c)(1), the records of the data and calculations used to determine the predominant activity;

- c. if using the "facility-specific" emission limit under 40 CFR 63.4490(c)(2), the data used to calculate the "facility-specific" emission limit; and
- d. the date, time, and duration of use, and the amount of any material applied in the compliant coating operations that did not meet the requirements of the "compliant material" option.

If demonstrating compliance with a predominant activity determination or a "facility-specific" emission limit, all coating operations included in the predominant activity determination or calculation of the "facility-specific" emission limit must comply with the applicable limit and requirements for the "compliant material" option.

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.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - 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;
 - b. any exceedance of the maximum application rate of 0.24 gallon per hour or of the 3 pounds VOC per gallon coating maximum VOC content for any coating, and the amount of such exceedance; and
 - c. if no deviations, report no deviations.
- (2) The permittee shall submit semiannual reports no later than July 31 or January 31 following the end of each semiannual reporting period (June 30 or December 31). 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 beginning and ending dates of the reporting period;
 - d. identification of the compliance method as either the "compliant material" option or the "without add-on control" option;

- 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 for the uncontrolled coating operations or the limitation from 40 CFR 63.4490 for each type of compliant coating applied;
- g. if using the predominant activity alternative according to 40 CFR 63.4490(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 63.4490(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, a statement that there were no deviations from the emissions limitations during the reporting period; and
- j. if there were any deviations during the compliance period, the report shall include the following information:
 - i. using the "compliant material" option the report shall include:
 - (a) an identification of each coating used that deviated from the applicable emission limit, and each thinner/additive, and cleaning material used that contained organic HAP and the dates and times each was used;
 - (b) the calculation of the organic HAP content for each coating that deviated from the applicable limit, kg (lb) organic HAP per liter (gallon) of coating solids;
 - (c) the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation; and
 - (d) a statement of the cause of each deviation;
 - ii. deviations from coating applications without add-on control shall include the following information:
 - (a) the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;
 - (b) the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

- (c) if applicable, the calculation used to determine mass of organic HAP in waste materials; and
 - (d) a statement of the cause of each deviation.
 - (3) The permittee shall identify in the semiannual reports any period of time where a coating was applied that exceeded the organic HAP content limitation contained in this NESHAP and/or a 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.
 - (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.
- f) **Testing Requirements**
 - (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitation:**

Visible emissions of particulate shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 - b. **Emission Limitation:**

0.16 pound of organic HAP emissions per pound of coating solids for any coating material used during each 12-month compliance period.

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods set forth in 40 CFR 63 Subpart PPPP under the "compliant coatings" or "emission rate without add-on controls" options, as appropriate.
 - c. **Emission Limitation:**

0.72 pound of VOC per hour.

Applicable Compliance Method:

Compliance shall be determined by monthly record keeping of coating usage, volatile organic compound content of each coating, and operating hours per

month. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings.

d. Emission Limitation:

3.20 tons of VOC per rolling, 12-month period.

Applicable Compliance Method:

The annual emissions limitation was based on the average hourly limit (0.72 pound per hour) multiplied by 8760 hours per year and divided by 2000 pounds per ton. Therefore, compliance with the hourly emission limitation serves as demonstration of compliance for the annual emission limitation.

e. Emission Limitation:

0.01 pound of PE per hour.

Applicable Compliance Method:

If requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(10).

f. Emission Limitation:

0.05 ton of PE per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was developed by multiplying the hourly allowable particulate emission limitation (0.01 pound per hour) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 pounds per ton. Therefore, if compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

g) Miscellaneous Requirements

When the associated drying oven (P014) is operating, for purposes of calculating the organic compound emission rates for this emissions unit and the associated oven (P014), the permittee shall utilize a value of 95% as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from the emissions unit. The remaining 5% of the organic compounds employed in this emissions unit shall be considered to be the uncontrolled emissions for the associated oven. This [split] of organic compound emissions between this emissions unit and the associated oven is based upon the amounts reported in the application.