State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION** **CERTIFIED MAIL**
**TRUMBULL COUNTY**

Street Address: 122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address: Lazarus Gov. Center P.O. Box 1049

**Application No: 02-18388**
**Fac ID:** 0278060693
**DATE: 12/26/2006**

Niles Mfg. and Finishing, Inc.
Beth Hall
465 Walnut Street
Niles, OH 44446

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

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

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **NEDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

| | |
|---|---|
| **Permit To Install** | **Issue Date: 12/26/2006** |
| **Terms and Conditions** | **Effective Date: 12/26/2006** |

**FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 02-18388**

| | |
|---|---|
| Application Number: | 02-18388 |
| Facility ID: | 0278060693 |
| Permit Fee: | **$200** |
| Name of Facility: | Niles Mfg. and Finishing, Inc. |
| Person to Contact: | Beth Hall |
| Address: | 465 Walnut Street<br>Niles, OH 44446 |

Location of proposed air contaminant source(s) [emissions unit(s)]:
**465 Walnut Street**
**Niles**, **Ohio**

Description of proposed emissions unit(s):
**3 e-coat line and a top coat line. Modification only requested for top coat line, K006.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Joseph P. Koncelik

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

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

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from 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 appropriate Ohio EPA District Office or local air agency. 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.)

#### 3. Records Retention Requirements

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.

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

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

**7. 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.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

**10. 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.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. 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 this Permit to Install.

## B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| Pollutant | Tons Per Year |
|---|---|
| Volatile Organic Compounds (VOC) | 60.9 |

Emissions Unit ID: **K001**

## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| K001 - electro deposition tank with new bake oven E-coat line no. 1- Tank B | OAC rule 3745-31-05(A)(3) | see A.2.a and b. |
| | OAC rule 3745-35-07(B) | see A.2.c and d |
| | OAC rule 3745-21-09(U) | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |

**2. Additional Terms and Conditions**

**2.a** The volatile organic compound (VOC) content shall not exceed 0.41 pound of VOC per gallon of coating, excluding water and exempt solvent(s), on a daily volume-weighted
average.

**2.b** The emissions from the coatings employed in this emissions unit shall not exceed 84.3 pounds of VOC per day based on an average for each calender month.

**2.c** The total VOC emissions from this emissions unit shall not exceed 15.4 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

**2.d** The permittee shall limit emissions from emissions units K001, K004, K005, and K006 to 60.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

## B. Operational Restrictions

1. The permittee shall use only hazardous air pollutants (HAPs) free coatings in this emissions unit.

2. The permittee shall not use more than 75,000 gallons of coatings per rolling, 12-month period.

## C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

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

   b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;

   c. the daily volume-weighted average VOC content of all coatings used , as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule3745-21-10 for CVOC,2; and

   d. for any coatings used, whether or not the coatings contain any HAPs.

2. The permittee shall collect, record and calculate the following information monthly for this emissions unit:

   a. the name and identification number of each coating used ;

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

   c. the total number of gallons (excluding water and exempt solvents) of each coating used for the month;

   d. the total monthly VOC emissions from this line, i.e., the summation of (b) times (c) for all coatings employed;

   e. the number of days the emissions unit was in operation each month;

f. the average daily VOC emission rate for all coatings employed, i.e., (d/e), in pounds/day (average); and

g. the rolling, 12-month summation of the coating usage in gallons each month.

**D. Reporting Requirements**

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office ) in writing of any daily record showing that the daily volume-weighted average VOC content(s) exceeded the applicable limitation(s). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

2. The permittee shall notify the Director (the Ohio EPA Northeast District Office ) in writing of any record for this line showing that the average daily VOC emissions exceeded the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

3 The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

4. The permittee shall notify the Director (the Ohio EPA Northeast District Office ) in writing of any record for this line showing that HAPs containing coatings were employed. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

5. The permittee shall notify the Director (the Ohio EPA Northeast District Office ) in writing of any record for this line showing exceedances of the rolling, 12-month coating usage limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

6. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing the rolling 12-month summation of the monthly emissions from emissions units K001, K004, K003, K005, and K006 exceeded 68.5

tons per year. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

## E. Testing Requirements

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

a. Emission Limitation:

0.41 lbs VOC/gallon coating excluding water and exempt solvents, as a daily volume-weighted average.

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emission Limitation:

84.3 pounds of VOC per day based on an average for each calender month.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2.

c. Emission Limitation:

15.4 tons per year, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be based upon the summation of the monthly records from the record keeping specified in Section C.2.

d. Emission Limitation:

60.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions from emissions units K001, K004, K005, and K006

Applicable Compliance Method:

Compliance shall be based upon the summation of the monthly records from the record keeping specified in Section C.2 for emissions units K001, K004, K005, and K006.

## F. Miscellaneous Requirements

1. The following Terms and Conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC Rule 3745-35- 07: A.through F.

2. The following Terms and Conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install number 02-6497: A. through F.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| K004 - electrodeposition tank with new bake oven E-coat line no. 2- Tank A | OAC rule 3745-31-05(A)(3) | see A.2.a and b. |
| | OAC rule 3745-35-07(B) | see A.2.c and d |
| | OAC rule 3745-21-09(U) | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |

**2. Additional Terms and Conditions**

**2.a** The volatile organic compound (VOC) content shall not exceed 0.41 pound of VOC per gallon of coating, excluding water and exempt solvent(s), on a daily volume-weighted average.

**2.b** The emissions from the coatings employed in this emissions unit shall not exceed 84.3 pounds of VOC per day based on an average for each calender month.

**2.c** The total VOC emissions from this emissions unit shall not exceed 15.4 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

**2.d** The permittee shall limit emissions from emissions units K001, K004, K005, and K006 to 60.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

## B. Operational Restrictions

1. The permittee shall use only hazardous air pollutants (HAPs) free coatings in this emissions unit.

2. The permittee shall not use more than 75,000 gallons of coatings per rolling, 12-month period.

## C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

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

   b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;

   c. the daily volume-weighted average VOC content of all coatings used , as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2; and

   d. for any coatings used, whether or not the coatings contain any HAPs.

2. The permittee shall collect, record and calculate the following information monthly for this emissions unit:

   a. the name and identification number of each coating used ;

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

   c. the total number of gallons (excluding water and exempt solvents) of each coating used for the month;

   d. the total monthly VOC emissions from this line, i.e., the summation of (b) times (c) for all coatings employed;

   e. the number of days the emissions unit was in operation each month; and

f. the average daily VOC emission rate for all coatings employed, i.e., (d/e), in pounds/day (average); and

g. the rolling, 12-month summation of the coating usage in gallons each month.

**D. Reporting Requirements**

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office ) in writing of any daily record showing that the daily volume-weighted average VOC

content(s) exceeded the applicable limitation(s). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

2. The permittee shall notify the Director (the Ohio EPA Northeast District Office ) in writing of any record for this line showing that the average daily VOC emissions exceeded the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

3 The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

4. The permittee shall notify the Director (the Ohio EPA Northeast District Office ) in writing of any record for this line showing that HAPs containing coatings were employed. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

5. The permittee shall notify the Director (the Ohio EPA Northeast District Office ) in writing of any record for this line showing exceedances of the rolling, 12-month coating usage limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

6. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing the rolling 12-month summation of the monthly emissions from emissions units K001, K004, K003, K005, and K006 exceeded 68.5 tons per year. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

## E. Testing Requirements

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

a. Emission Limitation:

0.41 lbs VOC/gallon coating excluding water and exempt solvents, as a daily volume-weighted average.

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emission Limitation:

84.3 pounds of VOC per day based on an average for each calender month.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2.

c. Emission Limitation:

15.4 tons per year, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be based upon the summation of the monthly records from the record keeping specified in Section C.2.

d. Emission Limitation:

60.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions from emissions units K001, K004, K005, and K006

Applicable Compliance Method:

Compliance shall be based upon the summation of the monthly records from the record keeping specified in Section C.2 for emissions units K001, K004, K005, and K006.

## F. Miscellaneous Requirements

1. The following Terms and Conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC Rule 3745-35- 07: A. through F.

2. The following Terms and Conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install number 02-77741: A. through F.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| K005 - electro deposition tank with bake oven E-coat line large hoist | OAC rule 3745-31-05(A)(3) | see A.2.a and b. |
| | OAC rule 3745-35-07(B) | see A.2.c and d |
| | OAC rule 3745-21-09(U) | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |

**2. Additional Terms and Conditions**

**2.a** The volatile organic compound (VOC) content shall not exceed 0.41 pound of VOC per gallon of coating, excluding water and exempt solvent(s), on a daily volume-weighted average.

**2.b** The emissions from the coatings employed in this emissions unit shall not exceed 11.2 pounds of VOC per day based on an average for each calender month.

**2.c** The total VOC emissions from this emissions unit shall not exceed 2.1 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

**2.d** The permittee shall limit emissions from emissions units K001, K004, K005, and K006 to 60.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

## B. Operational Restrictions

1. The permittee shall use only hazardous air pollutants (HAPs) free coatings in this emissions unit.

2. The permittee shall not use more than 10,000 gallons of coatings per rolling, 12-month period.

## C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

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

   b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;

   c. the daily volume-weighted average VOC content of all coatings used , as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2; and

   d. for any coatings used, whether or not the coatings contain any HAPs.

2. The permittee shall collect, record and calculate the following information monthly for this emissions unit:

   a. the name and identification number of each coating used ;

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

   c. the total number of gallons (excluding water and exempt solvents) of each coating used for the month;

   d. the total monthly VOC emissions from this line, i.e., the summation of (b) times (c) for all coatings employed;

   e. the number of days the emissions unit was in operation each month; and

f. the average daily VOC emission rate for all coatings employed, i.e., (d/e), in pounds/day (average); and

g. the rolling, 12-month summation of the coating usage in gallons each month.

**D. Reporting Requirements**

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office ) in writing of any daily record showing that the daily volume-weighted average VOC

content(s) exceeded the applicable limitation(s). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

2. The permittee shall notify the Director (the Ohio EPA Northeast District Office ) in writing of any record for this line showing that the average daily VOC emissions exceeded the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

3 The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

4. The permittee shall notify the Director (the Ohio EPA Northeast District Office ) in writing of any record for this line showing that HAPs containing coatings were employed. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

5. The permittee shall notify the Director (the Ohio EPA Northeast District Office ) in writing of any record for this line showing exceedances of the rolling, 12-month coating usage limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

6. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing the rolling 12-month summation of the monthly emissions from emissions units K001, K004, K003, K005, and K006 exceeded 68.5 tons per year. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

## E. Testing Requirements

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

   a. Emission Limitation:

0.41 lbs VOC/gallon coating excluding water and exempt solvents, as a daily volume-weighted average.

Applicable Compliance Method:

OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emission Limitation:

11.2 pounds of VOC per day based on an average for each calender month.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.2.

c. Emission Limitation:

2.1 tons per year, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be based upon the summation of the monthly records from the record keeping specified in Section C.2.

d. Emission Limitation:

60.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions from emissions units K001, K004, K005, and K006

Applicable Compliance Method:

Compliance shall be based upon the summation of the monthly records from the

record keeping specified in Section C.2 for emissions units K001, K004, K005, and K006.

## F. Miscellaneous Requirements

1. The following Terms and Conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC Rule 3745-35- 07: A. through F.

2. The following Terms and Conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install number 02-7741: A. through F.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| K006 - Automatic Top Coat Line spray booths and oven | OAC rule 3745-31-05(A)(3) | see A.2.a, c, and d. |
| | OAC rule 3745-35-07(B) | see A.2.b, e, and f. |
| Administrative Modification of PTI 02-18388 issued 10/7/2004 | OAC rule 3745-21-09(U)(1) | The emission limitation specified by this rule are equivalent to emission limitation established pursuant to OAC rule 3745-31-05(A)(3) and OAC rule 3745-21-09(U)(2)(f)(ii). |

**2. Additional Terms and Conditions**

**2.a** The volatile organic compound (VOC) content shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvent(s), on a daily volume-weighted average, for all coatings.

**2.b** The emissions from the coatings employed in this emissions unit shall not exceed 155.0 pounds per day based on a daily average for each calendar month.

**2.c** On days when this emissions unit is unable to meet the daily volume-weighted average VOC limitation, the permittee shall operate and maintain a VOC capture and control system (for spray booths, flash-off areas and bake oven ) that shall provide not less than an 81% overall control of VOC emissions and a control system (thermal incinerator) that shall provide an efficiency (percent

destruction) of not less than 90%, by weight, for VOC emissions vented to the control equipment.

**2.d** The emission from this emissions unit shall not exceed 8.7 pounds per hour of VOC when using the VOC capture and control system.

**2.e** The emissions from this emissions unit shall not exceed:

i. 28.0 tons per year of VOC;

ii. 9.6 tons/year of any individual HAP; and

iii. 20.5 tons/year of total aggregate HAPS,

based upon a rolling, 12-month summation of the monthly emissions.

**2.f** The permittee shall limit emissions from emissions units K001, K004, K005, and K006 to 60.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

## B. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit and its control system are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation

## C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit and its control system are in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

2. The permittee shall collect and record the following information for each day for the coating line and control equipment, when it is in operation:

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

   b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

3. The permittee shall collect and record the following information each month for this emissions unit:

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

   b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied;

   c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2;

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

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

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

   g. the total uncontrolled VOC emissions from all coatings and cleanup materials employed, in pounds or tons;

   h. on days when the capture and control system are in use, the calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds per day. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;

   i. the number of days the emissions unit was in operation each month; and

j. the average daily VOC emission rate for all coatings and cleanup materials employed, i.e., (g/i) or (h/i), in pounds/day.

4. The permittee shall collect and record the following information each month:

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

b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating, as applied, as a weight fraction;

c. the total combined Hazardous Air Pollutant (HAPs) content for each coating, as applied, as a weight fraction (i.e.,sum all the individual HAP contents from b);

d. the number of gallons of each coating employed;

e. the density of each coating employed;

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

g. the individual HAP content for each HAP of each cleanup material, as applied, as a weight fraction;

h. the total combined HAPs content of each cleanup material, as applied, as a weight fraction (i.e.,sum all the individual HAP contents from g);

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

j. the density of each cleanup material, as employed;

k. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons(i.e., for each HAP, the sum of (b) times (d) times (e) for each coating plus the sum of (g) times (i) times (j) for each cleanup material);

l. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons (i.e., the sum of (c) times (d) times (e) for each coating plus the sum of (h) times (i) times (j) for each cleanup material); and

m. the rolling, 12-month individual HAP emissions (for each HAP) and the rolling, 12-month combined HAPs emissions from all coatings and cleanup materials

employed, in tons.

A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

5. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

6. The permit to install for this emissions unit [K006] was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate Modeled (lbs/hr): 2.89

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 299

MAGLC (ug/m3): 10333

Pollutant: toluene

TLV (mg/m3): 377

Maximum Hourly Emission Rate Modeled (lbs/hr): 5.26

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 8976

MAGLC (ug/m3): 548

Pollutant: naphthalene

TLV (mg/m3): 52

Maximum Hourly Emission Rate Modeled (lbs/hr): 2.42

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 249

MAGLC (ug/m3): 1238

Pollutant: methyl amyl ketone

TLV (mg/m3): 233

Maximum Hourly Emission Rate Modeled (lbs/hr): 1.37

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 141

MAGLC (ug/m3): 5547

Pollutant: n butyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate Modeled (lbs/hr): 0.98

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 99

MAGLC (ug/m3): 16976

Pollutant: methyl isobutyl ketone

TLV (mg/m3): 205

Maximum Hourly Emission Rate Modeled (lbs/hr): 0.69

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 75

MAGLC (ug/m3): 4880

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis

level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office ) in writing of any daily record showing that the daily volume-weighted average VOC content(s) exceeded the applicable limitation(s). Notification is not necessary on days when this emissions unit control system is operated. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

2. The permittee shall notify the Director (the Ohio EPA Northeast District Office ) in writing of any record for this line showing that the daily VOC emissions exceeded the applicable limitation (155.0 pounds of VOC per day based on a daily average for each calendar month). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

3. The permittee shall submit quarterly summaries of the following records:

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

b. all 3-hour blocks of time during which the average combustion temperature

within the thermal incinerator does not comply with the temperature limitation specified above.

4. The permittee shall notify the Director of any monthly record showing any deviation from the following:

   a. the total individual HAP emissions limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling 12 month period; and

   b. the total combined HAP emissions limitation from all coatings and cleanup materials employed, in pounds or tons per rolling 12 month period.

   These reports shall include a description of the deviation, as well as the corrective actions that were taken to achieve compliance. The permittee shall submit annual reports which identify all exceedances of the above limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

5. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing the rolling 12-month summation of the monthly emissions from emissions units K001, K004, K003, K005, and K006 exceeded 60.9 tons per year. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

6. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.

7. The permittee shall submit annual reports that specify the VOC, individual HAP, and total combined HAPs emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

## E. Testing Requirements

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

a. Emission Limitation:

3.5 lbs VOC/gallon coating, excluding water and exempt solvents, as a daily volume-weighted average for all coatings, excluding water and exempt solvents, as a daily volume-weighted average.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3. USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emission Limitation:

155.0 pounds of VOC per day based on a daily average for each calendar month.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

c. Emission Limitation:

28.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance shall be based upon the summation of the daily records from the record keeping specified in Section C.3.

d. Emission Limitation:

8.7 pounds per hour of VOC when using the VOC capture and control system.

Applicable Compliance Method:

Compliance shall be based upon the emission testing specified in Section E.2.

e. Emission Limitation:

60.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions from emissions units K001, K004, K005, and K006

Applicable Compliance Method:

Compliance shall be based upon the summation of the monthly and daily records from the record keeping specified in the terms and conditions of the permit for emissions units K001, K004, K005, and K006.

f. Emission Limitation:

9.6 tons/year of any individual HAP; and 20.5 tons/year of total aggregate HAPS.

Applicable Compliance Method

Compliance shall be based upon the summation of the monthly records from the record keeping specified in Section C.4.

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

a. The emission testing shall be conducted within 3 months of the start of usage of coating which does not comply with Section A.2.a of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the VOC capture efficiency and control efficiency requirements specified in Section A.2.c and the hourly emission rate specified in Section A.2.d.

c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office .

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

f. The mass emissions testing for the purpose of complying with A.2.d shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office . The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s).

## F. Miscellaneous Requirements

1. The following Terms and Conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC Rule 3745-35- 07: A. through F., except C.5.

2. The following Terms and Conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install number 02-13295: A. through F.