



Environmental
Protection Agency

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

2/9/2012

Certified Mail

MIKE KUBRIN
Schneller LLC
6019 POWDERMILL RD.
KENT, OH 44240-7109

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1667040015
Permit Number: P0109415
Permit Type: Administrative Modification
County: Portage

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

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

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

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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Akron Regional Air Quality Management District. 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.

Sincerely,

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

Cc: U.S. EPA
ARAQMD; Pennsylvania; West Virginia; Canada



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Schneller LLC**

Facility ID: 1667040015
Permit Number: P0109415
Permit Type: Administrative Modification
Issued: 2/9/2012
Effective: 2/9/2012



Division of Air Pollution Control
Permit-to-Install
for
Schneller LLC

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Authorization

Facility ID: 1667040015
Facility Description: Coated Fabrics, Not Rubberized.
Application Number(s): M0001537
Permit Number: P0109415
Permit Description: Administrative modification of Permit to Install P0107304 to correct the rule citations and to match the terms and conditions in the Title V permit that is currently being processed. This permit covers four reverse roll coating lines with optional in-line rotogravure station (K001, K003, K004, and K007), one quad roll coating line with optional in-line rotogravure station (K005), and one silk screen printing line (K006).
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 2/9/2012
Effective Date: 2/9/2012

This document constitutes issuance to:

Schneller LLC
6019 POWDERMILL RD.
KENT, OH 44240-7109

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:

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

The above named entity is hereby granted 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: P0109415

Permit Description: Administrative modification of Permit to Install P0107304 to correct the rule citations and to match the terms and conditions in the Title V permit that is currently being processed. This permit covers four reverse roll coating lines with optional in-line rotogravure station (K001, K003, K004, and K007), one quad roll coating line with optional in-line rotogravure station (K005), and one silk screen printing line (K006).

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

Emissions Unit ID:	K005
Company Equipment ID:	ROTARY SCREEN
Superseded Permit Number:	P0107304
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	K006
Company Equipment ID:	SILKSCREEN
Superseded Permit Number:	P0107304
General Permit Category and Type:	Not Applicable

Group Name: Group 1

Emissions Unit ID:	K001
Company Equipment ID:	80-LINE
Superseded Permit Number:	P0107304
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	100-LINE
Superseded Permit Number:	P0107304
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K004
Company Equipment ID:	90-LINE
Superseded Permit Number:	P0107304
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K007
Company Equipment ID:	UV COATER
Superseded Permit Number:	P0107304
General Permit Category and Type:	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 Akron Regional Air Quality Management District.

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 Akron Regional Air Quality Management District. 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District.
- 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 Akron Regional Air Quality Management District. 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. Schneller, LLC has requested to restrict the emissions of volatile organic compounds (VOC) to 222.8 tons per year based upon the rolling, 12-month summation of the monthly emission rates. The company proposed this emission limitation to avoid being classified as a major source for Prevention of Significant Deterioration (PSD). Schneller, LLC has accepted this emission limitation as a facility-wide cap on VOC emissions from the following emissions units: K001, K003, K004, K005, K006, K007, and P002.
3. In order to determine compliance with the facility-wide VOC emission limitation, the permittee shall maintain monthly records of the following information for emissions units: K001, K003, K004, K005, K006, K007, and P002.
 - a) The permittee shall collect and record the following information each month for each controlled emissions units K001, K003, K004, K005, and K007:
 - (1) the name and identification number of each coating employed, as applied;
 - (2) the VOC content of each coating employed, in pounds per gallon, as applied;
 - (3) the number of gallons of each coating employed;
 - (4) the uncontrolled VOC emissions from all the coatings employed, in ton(s) per month for each emissions unit (i.e., the sum of a)(2) times a)(3) for all coatings applied during the month, divided by 2,000 pounds per ton);
 - (5) the calculated, controlled VOC emission rate for all coatings employed, in ton(s) per month for each emissions unit (i.e., the uncontrolled VOC emission rate, calculated in a)(4) above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance);
 - (6) the name and identification of each cleanup material employed;
 - (7) the VOC content of each cleanup material employed, in pounds per gallon, as applied;
 - (8) the number of gallons of each cleanup material employed;
 - (9) the VOC emission rate from all cleanup materials employed, in ton(s) per month for each emissions unit (i.e., the sum of a)(7)times a)(8) for each cleanup material, divided by 2000 pounds per ton);
 - (10) the total VOC emission rate from all coatings and cleanup materials employed for each emissions unit (i.e., a)(5) plus a)(9) for each emissions unit); and
 - (11) the total VOC emission rate from all coatings and cleanup materials employed for all controlled emissions units (K001, K003, K004, K005, and K007), in ton(s) per month (i.e., the summation of the VOC emissions from all emissions units in a)(10) above).

- b) The permittee shall collect and record the following information each month for emissions unit K006:
- (1) the name and identification number of each coating and cleanup material, as applied;
 - (2) the VOC content of each coating and cleanup material, in pounds per gallon, as applied;
 - (3) the number of gallons of each coating and cleanup material employed; and
 - (4) the total VOC emissions from all coatings and cleanup materials, in ton(s) per month (i.e., the sum of b)(2) times b)(3) for each coating plus the sum of b)(2) times b)(3) for each cleanup material, divided by 2000 pounds per ton).
- c) The permittee shall collect and record the following information each month for emissions unit P002:
- (1) the amount of material mixed, in pounds per month;
 - (2) the VOC emission rate from the mixing operation, excluding cleanup material, in ton(s) per month (i.e., multiply the emissions factor of 0.00356* pound of VOC per pound of material mixed by c)(1), divided by 2000 pounds per ton);
 - (3) the name and identification of each cleanup material employed;
 - (4) the VOC content of each cleanup material, in pounds of VOC per gallon, as applied;
 - (5) the number of gallons of each cleanup material employed;
 - (6) the VOC emission rate for all cleanup materials employed, in ton(s) per month (i.e., the sum of c)(4) times c)(5) for each cleanup material, divided by 2000 pounds per ton);
 - (7) the total VOC emission rate from the mixing operation and all cleanup materials employed, in ton(s) per month (i.e., the sum of c)(2) plus c)(6)).
- *The VOC emission factor was developed by the company and described in a document entitled "Quantification of Emissions from Compound Mixing", revised December 16, 2003.
- d) The permittee shall collect and record the following information each month for the facility (emissions units K001, K003, K004, K005, K006, K007, and P002):
- (1) the VOC emissions from all the materials employed, in ton(s) per month, i.e., [3.a)(11) + 3.b)(4) + 3.c)(7)]; and
 - (2) the VOC emissions during the rolling 12-month period, i.e., the summation of all VOC emissions, as recorded in d)(1) above, for the present month plus the previous 11 months of operation, in ton(s).

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

5. Compliance with the emission limitation in 3 above shall be determined in accordance with the following methods:

a) Emission Limitation:

222.8 tons of VOC per year based upon the rolling, 12-month summation of the monthly emission rates

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based upon the record keeping requirements established in 3.a), 3.b), 3.c), and 3.d) above.

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

C. Emissions Unit Terms and Conditions

1. K005, ROTARY SCREEN

Operations, Property and/or Equipment Description:

Quad roll coater with optional in-line rotogravure station and a 1.0 MM Btu/hour natural gas fired oven - Rotary Screen.

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>The emissions of volatile organic compounds (VOC) shall not exceed 7.83 pounds per hour for coatings and 34.3 tons per year for coatings and cleanup materials.</p> <p>The thermal oxidizer shall achieve a control (destruction) efficiency which is at least 96 percent, by weight, for VOC and the capture equipment shall achieve a capture efficiency which is at least 95 percent, by weight, for VOC.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart KK.</p>
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Prevention of Significant Deterioration (PSD) Permitting)	See 2, 3, 4, and 5 of Section B - Facility-Wide Terms and Conditions.
c.	OAC rule 3745-17-07(A)	For the natural gas fired oven, visible particulate emissions (PE) from the stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-10	For the natural gas fired oven, the maximum allowable amount of PE shall be 0.020 pound per million Btu of actual heat input.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-21-07(M)(2)	The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-21-19(D)(2)	The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-21-19(E)	See c)(1) and c)(2) below.
h.	40 CFR Part 60, Subpart FFF	<p>The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>The temperature sensor is located in the combustion chamber at the exhaust outlet. This sensor location and monitoring, record keeping, and reporting requirements of 40 CFR Part 63, Subpart KK have been deemed to satisfy the monitoring, record keeping, and reporting requirements of 40 CFR Part 60, Subpart FFF.</p>
i.	40 CFR Part 63, Subpart KK	Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 5 percent of the organic HAP applied for the month by operating a capture system and control device and demonstrating an overall organic HAP control efficiency of at least 95 percent for each month.
j.	40 CFR Part 63, Subpart A (40 CFR Part 63.823)	Table 1 to Subpart KK of Part 63 – Applicability of General Provisions to Subpart KK of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The hourly VOC emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.

However, if any proposed change(s), such as with production capacity, line speed, the types and/or quantities of materials used or processed, or anything else that increases the potential emission of any air pollutant for this emissions

unit, then the permittee shall apply for and obtain either a chapter 31 modification or an administrative modification to the permit to install prior to the change(s).

c) Operational Restrictions

(1) Flush cleaning operations.

The used cleaning solvent of any flush cleaning operation shall be emptied into an enclosed container or collection system that is kept closed when not in use or captured with wipers provided they comply with the housekeeping requirements of c)(2) below.

(2) Housekeeping measures for cleaning solvents and solvent-laden cleaning materials used in cleaning operations.

- a. All fresh and spent cleaning solvents shall be stored in nonabsorbent, nonleaking containers that are kept closed at all times except when filling or emptying.
- b. All used solvent-laden cloths and papers, and any other absorbent applicators used for cleaning, shall be placed in nonabsorbent, nonleaking containers or bags that are kept closed at all times except when depositing or removing these materials from the container or bag.
- c. The handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents shall be conducted in such a manner that minimizes spills.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart KK, including the following sections:

<u>Section:</u>	<u>Requirement:</u>
63.828(a)(2)(ii)	temperature monitoring and calibration of the chart recorder, data logger or temperature indicator
63.828(a)(4)(i)	temperature monitoring device requirements and location of the thermocouple or temperature sensor
63.828(a)(5)	capture system monitoring plan
63.828(b)	any excursion, unless otherwise excused, is considered a violation of the emission standard
63.829(b)(1)	monthly records of operating parameter data
63.829(b)(2)	records of each applicability determination
63.829(b)(3)	records for continuous monitoring system

- (2) The permittee shall install, calibrate, maintain, and operate according to manufacturer's specifications, a temperature monitoring device equipped with a continuous recorder. The temperature monitoring device shall be located in the firebox or in the duct immediately downstream of the firebox in a position before any substantial heat exchange occurs.
- (3) The permittee shall install, calibrate, maintain, and operate, according to manufacturer's specifications a pressure monitoring device equipped with a continuous recorder to measure pressure drop across the permanent total enclosure with an accuracy of at least 0.5 inch of water column or five per cent of the measured value, whichever is larger.
- (4) While operating a VOC emission control system for controlling emissions from this emissions unit, the permittee shall not operate any capture or control device within the VOC emission control system at a three-hour block average value less than the operating limits (operating parameter values) established during the most recent compliance test(s) that demonstrated compliance, except during periods of startup, shutdown, and malfunction.
- (5) The permittee shall inspect the VOC emission control system and monitoring equipment to assure that the VOC emission control system is operating properly, and that no leaks or malfunctions have occurred or are occurring. The inspections shall be made at the frequency defined by the equipment manufacturer, or as otherwise appropriate for each VOC emission control system and monitoring equipment, but not less than monthly.
- (6) For any capture system that is part of a VOC emissions control and that contains bypass lines which could divert flow (i.e., VOC emissions) away from the control device to the atmosphere, the permittee shall for each bypass line employ a valve closure monitoring system that ensures any bypass line valve is in the closed (nondiverting) position through monitoring of valve position at least once every fifteen minutes. The permittee shall inspect the monitoring system at least once every month to verify that the monitor will indicate valve position.
- (7) Establish the operating limit as follows:
 - a. Monitor and record the combustion temperature either in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs at least once every fifteen minutes during each of the three runs of the compliance test.
 - b. Calculate and record the average combustion temperature maintained during the compliance test. This average combustion temperature is the minimum operating limit for the thermal oxidizer.
- (8) The pressure drop across the permanent total enclosure shall be at least 0.007 inch of water.
- (9) The following types of records are to be maintained by the permittee of an aerospace manufacturing or rework facility subject to OAC rule 3745-21-19:

- a. Compliance demonstration records for coating operations.
 - b. Compliance demonstration records for cleaning operations.
 - c. Monitoring records for VOC emission control systems.
- (10) The permittee shall maintain the following records:
- a. For each coating in use at the facility:
 - i. The name and VOC content as received and as applied.
 - ii. The type of coating, as identified in paragraphs (D)(1)(a) and (D)(1)(b) of OAC rule 3745-21-19.
 - iii. Where applicable, identification of the coating as designated for control pursuant to paragraph (D)(2) of OAC rule 3745-21-19 or exempted pursuant to paragraphs (D)(3)(a) to (D)(3)(e) of OAC rule 3745-21-19.
 - b. All data, calculations, and test results (including USEPA Method 24 results) used in determining the VOC content of each coating, expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
 - c. The amount (gallons) of each coating used each month at the facility.
 - d. For any coating operation controlled by a VOC emission control system:
 - i. identification of the coating line;
 - ii. documentation on the overall control efficiency of the VOC emission control system and the control efficiency of the thermal oxidizer within the VOC emission control system, including design estimates and the results of compliance tests conducted pursuant to paragraphs (F)(2), (F)(3), and (I) of OAC rule 3745-21-19; and
 - iii. for any coating that is controlled by the VOC emission control system, the name of the coating, the dates (or time periods) of control, and the amount (gallons) of such coating controlled each month.
- (11) For any VOC emission control system, the permittee shall maintain monitoring records as follows for the thermal oxidizer:
- a. continuous records of the firebox temperature;
 - b. records of all three-hour block averages of the firebox temperature during operation of the emissions unit;
 - c. a record of the operating limit established in d)(7) above; and
 - d. records of the times and durations of all periods during process or control operation when the monitoring device is not working.

- (12) For the capture system bypass line that could divert flow (i.e., VOC emissions) away from the control device to the atmosphere, the permittee shall maintain the monitoring records specified below for the valve closure monitoring system:
 - a. hourly records of whether the monitoring device was operating and whether a diversion of flow (VOC emissions) to the atmosphere was detected at any time during the hour;
 - b. a record indicating that a monthly inspection of the monitoring device has been done; and
 - c. records of the times and durations of all periods when the monitoring device is not operating or flow (VOC emissions) is diverted to the atmosphere.
- (13) For monthly (or more frequent) inspections of the VOC emission control system and monitoring equipment conducted pursuant to d)(5) above, a record of the results of each inspection.
- (14) All records specified in d)(9) through d)(13) above shall be retained by the permittee for a period of not less than five years and shall be made available to the director or any authorized representative of the director for review during normal business hours.

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart KK, including the following sections:

<u>Section:</u>	<u>Requirement:</u>
63.830(b)(6)	semi-annual summary report.

- (2) The permittee shall submit semiannual compliance status reports no later than thirty calendar days after the end of each six-month period to the appropriate Ohio environmental protection agency district office or local air agency. The first report shall be submitted no later than thirty calendar days after the end of the first six-month period following the compliance date. Subsequent reports shall be submitted no later than thirty calendar days after the end of each six-month period following the first report or no later than thirty calendar days after the end of each six-month period otherwise established within a permit issued for the aerospace manufacturing or rework facility. For each semiannual compliance status report, the permittee shall submit the following information for the six-month period covered by the report:
 - a. For any VOC emission control system employed to meet paragraph (D)(2) of OAC rule 3745-21-19, any changes to monitoring devices previously reported and required under paragraph (G) of OAC rule 3745-21-19.
 - b. If any subsequent compliance tests of the VOC emission control system are conducted during the semiannual reporting period after the initial compliance status report has been submitted, the semiannual compliance status report shall include the results of each compliance test, a complete test report, and the

compliance test monitoring data as described under paragraphs (K)(2)(c)(iii) to (K)(2)(c)(v) of OAC rule 3745-21-19.

- c. For cleaning operations subject to paragraph (E) of OAC rule 3745-21-19, the permittee shall submit in the semiannual compliance status report any changes to the previous reporting of the description of the types of cleaning operations and the listing of the cleaning solvents employed in each cleaning operation.
- d. Compliance certification for semiannual reporting period.

The permittee shall submit with the semiannual compliance status report, the following compliance certifications, where applicable:

- i. For any coating operation that is equipped with a VOC emission control system to comply with paragraph (D)(2) of OAC rule 3745-21-19:
 - (a) The compliance certification shall state that the three-hour block averages of the monitoring parameters recorded pursuant to paragraph (K)(5) of OAC rule 3745-21-19 had complied with the operating limits (operating parameter values) for the monitoring parameters established under paragraph (J)(2) of OAC rule 3745-21-19 during of all periods of operation of the coating operation in the semiannual reporting period; or should otherwise identify the times and durations of all periods of noncompliance and the reasons for noncompliance.
 - (b) The compliance certification shall identify the times and durations of all periods during coating operation or control operation when the monitoring device is not working, as recorded pursuant to paragraph (J)(3) of OAC rule 3745-21-19 and paragraph (K)(5) of rule 3745-21-15 of the Administrative Code.
 - (c) For any capture system bypass line, the compliance certification shall identify the times and durations of all periods in which the captured VOC emissions were discharged to atmosphere instead of a control device, as recorded pursuant to paragraph (J)(3) of OAC rule 3745-21-19 and paragraph (K)(5)(f) of rule 3745-21-15 of the Administrative Code, and the reasons for the discharges to atmosphere.
 - (d) The compliance certification shall state that the overall reduction and control of VOC emissions, based on the most recent compliance test conducted in accordance with paragraph (I) of OAC rule 3745-21-19, has met the requirements under paragraph (D)(2) of OAC rule 3745-21-19 for each coating designated for control during the semiannual reporting period, or should otherwise identify the periods of noncompliance and the reasons for noncompliance.

- ii. For cleaning operations subject to paragraph (E) of OAC rule 3745-21-19, the compliance certification shall identify for the semiannual reporting period:
 - (a) Any other instance of noncompliance with a requirement under paragraph (E) of OAC rule 3745-21-19; and
 - (b) If the cleaning operations have been in compliance for the semiannual reporting period, a statement that the cleaning operations have been in compliance with the applicable requirements.
- iii. The compliance certification shall identify and describe any corrective actions considered and implemented for any noncompliance being reported in the compliance certification.
- iv. The compliance certification shall be signed by the responsible official of a Title V facility, as defined in OAC rule 3745-77-01 or the signatory authority under OAC rule 3745-31-02 for a facility that is not Title V, that owns or operates the aerospace manufacturing or rework facility.

f) Testing Requirements

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

- a. Emission Limitation:

Organic HAP emissions shall be limited to no more than 5 percent of the organic HAP applied for the month by operating a capture system and control device and demonstrating an overall organic HAP control efficiency of at least 95 percent for each month.

Applicable Compliance Method:

Compliance with the allowable organic HAP emission limitation above shall be demonstrated through performance tests of the capture efficiency and control device efficiency and continuing compliance through continuous monitoring of the capture system and control device operating parameters. The permittee shall:

- i. Monitor an operating parameter established in accordance with 40 CFR Part 63.828(a)(4) to assure control device efficiency, and
- ii. For each capture system delivering emissions to that oxidizer, monitor an operating parameter established in accordance with 40 CFR Part 63.828(a)(5) to assure capture efficiency, and
- iii. Determine the organic HAP emission for those presses served by each capture system delivering emissions to that oxidizer by:

- (a) Determining the oxidizer destruction efficiency (E) using the procedure in 40 CFR 63.827(d);
- (b) Determining the capture system efficiency (F) in accordance with 40 CFR Part 63.827(e)-(f); and
- (c) Calculating the overall organic HAP control efficiency, (R), using the following equation: $R = \frac{(E)(F)}{100}$.

b. Emission Limitation:

For the natural gas fired oven, visible PE from the stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the allowable visible PE limitation above shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

c. Emission Limitation:

For the natural gas fired oven, the maximum allowable amount of PE shall be 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance with the allowable PE limitation above shall be demonstrated by dividing the AP-42 emission factor 7.6 pounds of PE per million standard cubic feet (scf) of natural gas fired* by 1020 Btu per scf.

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with OAC rule 3745-17-03(B)(9).

*AP-42 emission factor from Table 1.4-2 dated 7/98.

d. Emission Limitation:

The emissions of VOC shall not exceed 7.83 pounds per hour for coatings.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated by multiplying the worst-case coating in pounds of VOC per gallon of coating by the maximum hourly usage rate in gallons times (1-0.95*).

*minimum overall control efficiency

e. Emission Limitation:

The emissions of VOC shall not exceed 34.3 tons per year for coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based upon the record keeping requirements established in 4.a) of Section B – Facility-Wide Terms and conditions.

f. Emission Limitations:

The thermal oxidizer shall achieve a control (destruction) efficiency which is at least 96 percent, by weight, and the capture equipment shall achieve a capture efficiency which is at least 95 percent, by weight, for VOC.

Applicable Compliance Method:

Compliance with the control (destruction) efficiency and capture efficiency for VOC above shall be demonstrated based on the results of emissions testing conducted in accordance with f)(2) below.

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

- a. The emission testing for the control efficiency was conducted on March 16, 2011.
- b. The permanent total enclosure was verified on May 2, 2006 resulting in the capture efficiency being 100%. As long as no changes to the permanent total enclosure have been made since the initial capture efficiency testing, retesting for the capture efficiency will not be required. If changes are made to the permanent total enclosure, then the capture efficiency shall be reevaluated as specified in c below.
- c. If required, 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.)
- d. 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. 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.
- e. 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 appropriate Ohio EPA District Office or local air agency.

- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

- (1) None.

2. K006, SILKSCREEN

Operations, Property and/or Equipment Description:

Silk screen printing machine with 0.75 MM Btu/hour natural gas fired oven - Silkscreen.

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The emissions of volatile organic compounds (VOC) shall not exceed 15.4 pounds per hour for coatings and 67.5 tons per year for coatings and cleanup materials.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Prevention of Significant Deterioration (PSD) Permitting)	See 2, 3, 4, and 5 of Section B - Facility-Wide Terms and Conditions.
c.	OAC rule 3745-17-07(A)	For the natural gas fired oven, visible particulate emissions (PE) from the stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-10	For the natural gas fired oven, the maximum allowable amount of PE shall be 0.020 pound per million Btu of actual heat input.
e.	OAC rule 3745-21-19(D)(1)	Coatings applied in the coating operation shall not exceed 7.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

(2) Additional Terms and Conditions

a. The hourly VOC emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.

However, if any proposed change(s), such as with production capacity, line speeds, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a chapter 31 modification or an administrative modification to the permit to install prior to the change(s).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The VOC content of a coating shall be determined by the permittee in accordance with paragraph (B) of rule 3745-21-10 of the Administrative Code, wherein formulation data or USEPA Method 24 procedures (which include various ASTM measurement methods) may be employed.
- (2) The following types of records are to be maintained by the permittee of an aerospace manufacturing or rework facility subject to OAC rule 3745-21-19:
- a. Compliance demonstration records for coating operations.
 - b. Compliance demonstration records for cleaning operations.
 - c. Monitoring records for VOC emission control systems.
- (3) The permittee shall maintain the following records:
- a. For each coating in use at the facility:
 - i. The name and VOC content as received and as applied.
 - ii. The type of coating, as identified in paragraphs (D)(1)(a) and (D)(1)(b) of OAC rule 3745-21-19.
 - iii. Where applicable, identification of the coating as designated for control pursuant to paragraph (D)(2) of OAC rule 3745-21-19 or exempted pursuant to paragraphs (D)(3)(a) to (D)(3)(e) of OAC rule 3745-21-19.
 - b. All data, calculations, and test results (including USEPA Method 24 results) used in determining the VOC content of each coating, expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
 - c. The amount (gallons) of each coating used each month at the facility.
- (4) All records specified in d)(2) and d)(3) above shall be retained by the permittee for a period of not less than five years and shall be made available to the director or any authorized representative of the director for review during normal business hours.

e) Reporting Requirements

- (1) The permittee shall submit semiannual compliance status reports no later than thirty calendar days after the end of each six-month period to the appropriate Ohio environmental protection agency district office or local air agency. The first report shall be submitted no later than thirty calendar days after the end of the first six-month period following the compliance date. Subsequent reports shall be submitted no later than thirty calendar days after the end of each six-month period following the first report or no later than thirty calendar days after the end of each six-month period otherwise established within a permit issued for the aerospace manufacturing or rework facility. For each semiannual compliance status report, the permittee shall submit the following information for the six-month period covered by the report:
- a. For any coating operation subject to paragraph (D)(1) of OAC rule 3745-21-19, the permittee shall state in the semiannual compliance status report any changes to the previous reporting of the types of coatings and the VOC content limits for the coatings.
 - b. Compliance certification for semiannual reporting period.

The permittee shall submit with the semiannual compliance status report, the following compliance certifications, where applicable:

- i. For any coating that is subject to a VOC content limit of paragraph (D)(1) of OAC rule 3745-21-19, the compliance certification shall state that only coatings which comply with the applicable VOC content limit have been used each operating day in the semiannual reporting period, or should otherwise identify the periods of use of coatings that did not comply, the reasons for such use of noncompliant coatings, and the amounts and VOC contents of each such noncompliant coating used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.
- ii. The compliance certification shall identify and describe any corrective actions considered and implemented for any noncompliance being reported in the compliance certification.
- iii. The compliance certification shall be signed by the responsible official of a Title V facility, as defined in OAC rule 3745-77-01 or the signatory authority under OAC rule 3745-31-02 for a facility that is not Title V, that owns or operates the aerospace manufacturing or rework facility.

f) Testing Requirements

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

a. Emission Limitation:

For the natural gas fired oven, visible PE from the stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the allowable visible PE limitation above shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

b. Emission Limitation:

For the natural gas fired oven, the maximum allowable amount of PE shall be 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance with the allowable PE limitation above shall be demonstrated by dividing the AP-42 emission factor 7.6 pounds of PE per million standard cubic feet (scf) of natural gas fired* by 1020 Btu per scf.

If required, the permittee shall demonstrate compliance with the PE limitation above in accordance with OAC rule 3745-17-03(B)(9).

*AP-42 emission factor from Table 1.4-2 dated 7/98.

c. Emission Limitation:

The emissions of VOC shall not exceed 15.4 pounds per hour for coatings.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated by multiplying the worst-case coating in pounds of VOC per gallon of coating by the maximum hourly usage rate in gallons.

d. Emission Limitation:

The emissions of VOC shall not exceed 67.5 tons per year for coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based upon the record keeping requirements established in 3.b) of Section B – Facility-Wide Terms and conditions.

e. Emission Limitation:

Coatings applied in the coating operation shall not exceed 7.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated based upon the record keeping requirements established in d)(1) and d)(3) above.

g) Miscellaneous Requirements

- (1) None.

3. Emissions Unit Group -Group 1: K001, K003, K004, K007,

EU ID	Operations, Property and/or Equipment Description
K001	Reverse roll coater with optional in-line rotogravure station and a 4.5 MM Btu/hour natural gas fired oven - 80 line coater.
K003	Reverse roll coater with optional in-line rotogravure station and a 6.0 MM Btu/hour natural gas fired oven - 100 line coater.
K004	Reverse roll coater with optional in-line rotogravure station and a 6.0 MM Btu/hour natural gas fired oven - 90 line coater.
K007	Reverse roll coater with optional in-line rotogravure station and an infrared oven - UV Coater.

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>For emissions unit K001: The emissions of volatile organic compounds (VOC) shall not exceed 20.3 pounds per hour for coatings and 88.9 tons per year for coatings and cleanup materials.</p> <p>The capture equipment for emissions unit K001 shall achieve a capture efficiency which is at least 98.2 percent, by weight, for VOC.</p> <p>For emissions unit K003: The emissions of VOC shall not exceed 16.25 pounds per hour for coatings and 71.2 tons per year for coatings and cleanup materials.</p> <p>The capture equipment for emissions unit K003 shall achieve a capture efficiency which is at least 92.2 percent, by weight, for VOC.</p> <p>For emissions unit K004: The emissions</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>of VOC shall not exceed 24.53 pounds per hour for coatings and 107.4 tons per year for coatings and cleanup materials.</p> <p>The capture equipment for emissions unit K004 shall achieve a capture efficiency which is at least 98.5 percent, by weight, for VOC.</p> <p>For emissions unit K001, K003, and K004, the thermal oxidizer shall achieve a control (destruction) efficiency which is at least 96 percent, by weight, for VOC.</p> <p>For emissions unit K007: The emissions of VOC shall not exceed 2.5 pounds per hour for coatings and 11.0 tons per year for coatings and cleanup materials.</p> <p>For emissions unit K007, the thermal oxidizer and capture equipment shall achieve an overall control efficiency of at least 95 percent, by weight, for VOC.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart KK.</p>
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Prevention of Significant Deterioration (PSD) Permitting)	See 2, 3, 4, and 5 of Section B - Facility-Wide Terms and Conditions.
c.	OAC rule 3745-21-19(D)(2)	The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 60, Subpart FFF	<p>For emissions units K003, K004, and K007, the emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>The temperature sensor is located in the combustion chamber at the exhaust outlet. This sensor location and monitoring, record keeping, and reporting requirements of 40 CFR Part 63, Subpart KK have been deemed to satisfy the monitoring, record keeping, and reporting</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		requirements of 40 CFR Part 60, Subpart FFF.
e.	40 CFR Part 63, Subpart KK	Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 5 percent of the organic HAP applied for the month by operating a capture system and control device and demonstrating an overall organic HAP control efficiency of at least 95 percent for each month.
f.	40 CFR Part 63, Subpart A (40 CFR Part 63.823)	Table 1 to Subpart KK of Part 63 – Applicability of General Provisions to Subpart KK of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The hourly VOC emission limitations were established to reflect the potential to emit for the emissions units listed above. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, line speed, the types and/or quantities of materials used or processed, or anything else that increases the potential emission of any air pollutant for the emissions units listed above, then the permittee shall apply for and obtain either a chapter 31 modification or an administrative modification to the permit to install prior to the change(s).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart KK, including the following sections:

<u>Section:</u>	<u>Requirement:</u>
63.828(a)(2)(ii)	temperature monitoring and calibration of the chart recorder, data logger or temperature indicator
63.828(a)(4)(i)	temperature monitoring device requirements and location of the thermocouple or temperature sensor

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| 63.828(a)(5) | capture system monitoring plan |
| 63.828(b) | any excursion, unless otherwise excused, is considered a violation of the emission standard |
| 63.829(b)(1) | monthly records of operating parameter data |
| 63.829(b)(2) | records of each applicability determination |
| 63.829(b)(3) | records for continuous monitoring system |
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- (2) The permittee shall install, calibrate, maintain, and operate according to manufacturer's specifications, a temperature monitoring device equipped with a continuous recorder. The temperature monitoring device shall be located in the firebox or in the duct immediately downstream of the firebox in a position before any substantial heat exchange occurs.
 - (3) The permittee shall install, calibrate, maintain, and operate, according to manufacturer's specifications a pressure monitoring device equipped with a continuous recorder to measure pressure drop across the permanent total enclosure with an accuracy of at least 0.5 inch of water column or five per cent of the measured value, whichever is larger.
 - (4) While operating a VOC emission control system for controlling emissions from emissions units K003 and K004, the permittee shall not operate any capture or control device within the VOC emission control system at a three-hour block average value less than the operating limits (operating parameter values) established during the most recent compliance test(s) that demonstrated compliance, except during periods of startup, shutdown, and malfunction.
 - (5) While operating a VOC emission control system for controlling emissions from emissions units K001 and K007, the permittee shall not operate any capture or control device within the VOC emission control system at a three-hour block average value less than the operating limits (operating parameter values) established during the most recent compliance test(s) that demonstrated compliance, except during periods of startup, shutdown, and malfunction.
 - (6) The permittee shall inspect the VOC emission control system and monitoring equipment to assure that the VOC emission control system is operating properly, and that no leaks or malfunctions have occurred or are occurring. The inspections shall be made at the frequency defined by the equipment manufacturer, or as otherwise appropriate for each VOC emission control system and monitoring equipment, but not less than monthly.
 - (7) For any capture system that is part of a VOC emissions control and that contains bypass lines which could divert flow (i.e., VOC emissions) away from the control device to the atmosphere, the permittee shall for each bypass line employ a valve closure monitoring system that ensures any bypass line valve is in the closed (nondiverting) position through monitoring of valve position at least once every fifteen minutes. The permittee shall inspect the monitoring system at least once every month to verify that the monitor will indicate valve position.

- (8) Establish the operating limit as follows:
- a. Monitor and record the combustion temperature either in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs at least once every fifteen minutes during each of the three runs of the compliance test.
 - b. Calculate and record the average combustion temperature maintained during the compliance test. This average combustion temperature is the minimum operating limit for the thermal oxidizer.
- (9) The pressure drop across the permanent total enclosure shall be at least 0.007 inch of water.
- (10) The following types of records are to be maintained by the permittee of an aerospace manufacturing or rework facility subject to OAC rule 3745-21-19:
- a. Compliance demonstration records for coating operations.
 - b. Compliance demonstration records for cleaning operations.
 - c. Monitoring records for VOC emission control systems.
- (11) The permittee shall maintain the following records:
- a. For each coating in use at the facility:
 - i. The name and VOC content as received and as applied.
 - ii. The type of coating, as identified in paragraphs (D)(1)(a) and (D)(1)(b) of OAC rule 3745-21-19.
 - iii. Where applicable, identification of the coating as designated for control pursuant to paragraph (D)(2) of OAC rule 3745-21-19 or exempted pursuant to paragraphs (D)(3)(a) to (D)(3)(e) of OAC rule 3745-21-19.
 - b. All data, calculations, and test results (including USEPA Method 24 results) used in determining the VOC content of each coating, expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.
 - c. The amount (gallons) of each coating used each month at the facility.
 - d. For any coating operation controlled by a VOC emission control system:
 - i. identification of the coating line;
 - ii. documentation on the overall control efficiency of the VOC emission control system and the control efficiency of the thermal oxidizer within the VOC emission control system, including design estimates and the results of compliance tests conducted pursuant to paragraphs (F)(2), (F)(3), and (I) of OAC rule 3745-21-19; and

- iii. for any coating that is controlled by the VOC emission control system, the name of the coating, the dates (or time periods) of control, and the amount (gallons) of such coating controlled each month.
- (12) For any VOC emission control system, the permittee shall maintain monitoring records as follows for the thermal oxidizer:
- a. continuous records of the firebox temperature;
 - b. records of all three-hour block averages of the firebox temperature during operation of any of the emissions units listed above;
 - c. a record of the operating limit established in d)(8) above; and
 - d. records of the times and durations of all periods during process or control operation when the monitoring device is not working.
- (13) For the capture system bypass line that could divert flow (i.e., VOC emissions) away from the control device to the atmosphere, the permittee shall maintain the monitoring records specified below for the valve closure monitoring system:
- a. hourly records of whether the monitoring device was operating and whether a diversion of flow (VOC emissions) to the atmosphere was detected at any time during the hour;
 - b. a record indicating that a monthly inspection of the monitoring device has been done; and
 - c. records of the times and durations of all periods when the monitoring device is not operating or flow (VOC emissions) is diverted to the atmosphere.
- (14) For monthly (or more frequent) inspections of the VOC emission control system and monitoring equipment conducted pursuant to d)(6) above, a record of the results of each inspection.
- (15) All records specified in d)(10) through d)(14) above shall be retained by the permittee for a period of not less than five years and shall be made available to the director or any authorized representative of the director for review during normal business hours.
- e) Reporting Requirements
- (1) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart KK, including the following sections:
- | <u>Section:</u> | <u>Requirement:</u> |
|-----------------|----------------------------|
| 63.830(b)(6) | semi-annual summary report |
- (2) The permittee shall submit semiannual compliance status reports no later than thirty calendar days after the end of each six-month period to the appropriate Ohio environmental protection agency district office or local air agency. The first report shall be submitted no later than thirty calendar days after the end of the first six-month period

following the compliance date. Subsequent reports shall be submitted no later than thirty calendar days after the end of each six-month period following the first report or no later than thirty calendar days after the end of each six-month period otherwise established within a permit issued for the aerospace manufacturing or rework facility. For each semiannual compliance status report, the permittee shall submit the following information for the six-month period covered by the report:

- a. For any VOC emission control system employed to meet paragraph (D)(2) of OAC rule 3745-21-19, any changes to monitoring devices previously reported and required under paragraph (G) of OAC rule 3745-21-19.
- b. If any subsequent compliance tests of the VOC emission control system are conducted during the semiannual reporting period after the initial compliance status report has been submitted, the semiannual compliance status report shall include the results of each compliance test, a complete test report, and the compliance test monitoring data as described under paragraphs (K)(2)(c)(iii) to (K)(2)(c)(v) of OAC rule 3745-21-19.
- c. Compliance certification for semiannual reporting period.

The permittee shall submit with the semiannual compliance status report, the following compliance certifications, where applicable:

- i. For any coating operation that is equipped with a VOC emission control system to comply with paragraph (D)(2) of OAC rule 3745-21-19:
 - (a) The compliance certification shall state that the three-hour block averages of the monitoring parameters recorded pursuant to paragraph (K)(5) of OAC rule 3745-21-19 had complied with the operating limits (operating parameter values) for the monitoring parameters established under paragraph (J)(2) of OAC rule 3745-21-19 during of all periods of operation of the coating operation in the semiannual reporting period; or should otherwise identify the times and durations of all periods of noncompliance and the reasons for noncompliance.
 - (b) The compliance certification shall identify the times and durations of all periods during coating operation or control operation when the monitoring device is not working, as recorded pursuant to paragraph (J)(3) of OAC rule 3745-21-19 and paragraph (K)(5) of rule 3745-21-15 of the Administrative Code.
 - (c) For any capture system bypass line, the compliance certification shall identify the times and durations of all periods in which the captured VOC emissions were discharged to atmosphere instead of a control device, as recorded pursuant to paragraph (J)(3) of OAC rule 3745-21-19 and paragraph (K)(5)(f) of rule 3745-21-15 of the Administrative Code, and the reasons for the discharges to atmosphere.

- (d) The compliance certification shall state that the overall reduction and control of VOC emissions, based on the most recent compliance test conducted in accordance with paragraph (I) of OAC rule 3745-21-19, has met the requirements under paragraph (D)(2) of OAC rule 3745-21-19 for each coating designated for control during the semiannual reporting period, or should otherwise identify the periods of noncompliance and the reasons for noncompliance.
 - ii. The compliance certification shall identify and describe any corrective actions considered and implemented for any noncompliance being reported in the compliance certification.
 - iii. The compliance certification shall be signed by the responsible official of a Title V facility, as defined in OAC rule 3745-77-01 or the signatory authority under OAC rule 3745-31-02 for a facility that is not Title V, that owns or operates the aerospace manufacturing or rework facility.
- f) **Testing Requirements**
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitation:**

Organic HAP emissions shall be limited to no more than 5 percent of the organic HAP applied for the month by operating a capture system and control device and demonstrating an overall organic HAP control efficiency of at least 95 percent for each month.

Applicable Compliance Method:

Compliance with the allowable organic HAP emission limitation above shall be demonstrated through performance tests of the capture efficiency and control device efficiency and continuing compliance through continuous monitoring of the capture system and control device operating parameters. The permittee shall:

 - i. Monitor an operating parameter established in accordance with 40 CFR Part 63.828(a)(4) to assure control device efficiency, and
 - ii. For each capture system delivering emissions to that oxidizer, monitor an operating parameter established in accordance with 40 CFR Part 63.828(a)(5) to assure capture efficiency, and
 - iii. Determine the organic HAP emission for those presses served by each capture system delivering emissions to that oxidizer by:
 - (a) Determining the oxidizer destruction efficiency (E) using the procedure in 40 CFR 63.827(d);

- (b) Determining the capture system efficiency (F) in accordance with 40 CFR Part 63.827(e)-(f); and
- (c) Calculating the overall organic HAP control efficiency, (R), using the following equation: $R = \frac{(E)(F)}{100}$.

b. Emission Limitations:

For emissions unit K001: The emissions of VOC shall not exceed 20.3 pounds per hour for coatings.

For emissions unit K003: The emissions of VOC shall not exceed 16.25 pounds per hour for coatings.

For emissions unit K004: The emissions of VOC shall not exceed 24.53 pounds per hour for coatings.

For emissions unit K007: The emissions of VOC shall not exceed 2.5 pounds per hour for coatings.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitations above shall be demonstrated by multiplying the worst-case coating in pounds of VOC per gallon of coating by the maximum hourly usage rate in gallons times (1-0.95*).

*minimum overall control efficiency

c. Emission Limitations:

For emissions unit K001: The emissions of VOC shall not exceed 88.9 tons per year for coatings and cleanup materials.

For emissions unit K003: The emissions of VOC shall not exceed 71.2 tons per year for coatings and cleanup materials.

For emissions unit K004: The emissions of VOC shall not exceed 107.4 tons per year for coatings and cleanup materials.

For emissions unit K007: The emissions of VOC shall not exceed 11.0 tons per year for coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitations above shall be demonstrated based upon the record keeping requirements established in 3.a) of Section B – Facility-Wide Terms and conditions.

d. Emission Limitations:

The capture equipment for emissions unit K001 shall achieve a capture efficiency which is at least 98.2 percent, by weight, for VOC.

The capture equipment for emissions unit K003 shall achieve a capture efficiency which is at least 92.2 percent, by weight, for VOC.

The capture equipment for emissions unit K004 shall achieve a capture efficiency which is at least 98.5 percent, by weight, for VOC.

For emissions unit K001, K003, and K004, the thermal oxidizer shall achieve a control (destruction) efficiency which is at least 96 percent, by weight, for VOC.

For emissions unit K007, the thermal oxidizer and capture equipment shall achieve an overall control efficiency of at least 95 percent, by weight, for VOC.

Applicable Compliance Method:

Compliance with the control (destruction) efficiency, capture efficiency, and overall control efficiency for VOC above shall be demonstrated based on the results of emissions testing conducted in accordance with f)(2) below.

- (2) The permittee shall conduct, or have conducted, emission testing for the emissions units listed above in accordance with the following requirements:
- a. The emission testing for control efficiency was conducted on March 16, 2011 for emissions units K003 and K004 and on May 13, 2011 for emissions units K001 and K007.
 - b. The permanent total enclosures for emissions units K001, K003, K004, and K007 were verified on May 3, 2006, March 16, 2011, May 2, 2006, and May 3, 2006, respectively, resulting in the capture efficiency being 100%. As long as no changes to the permanent total enclosure have been made since the initial capture efficiency testing, retesting for the capture efficiency will not be required. If changes are made to the permanent total enclosure, then the capture efficiency shall be reevaluated as specified in c below.
 - c. If required, 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.)
 - d. 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. 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.

- e. 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 appropriate Ohio EPA District Office or local air agency.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

- (1) None.