

3/2/2012

Certified Mail

Aaron Cheney
Whirlpool Findlay Division
4901 N. Main St
Findlay, OH 45840

Facility ID: 0332010170
Permit Number: P0109183
County: Hancock

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

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Courier. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,


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

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

PUBLIC NOTICE
3/2/2012 Issuance of Draft Air Pollution Title V Permit

Whirlpool Findlay Division

4901 North Main Street,

Findlay, OH 45840

Hancock County

FACILITY DESC.: Other Major Household Appliance Manufacturing

PERMIT #: P0109183

PERMIT TYPE: Renewal

PERMIT DESC: Title V permit renewal for Whirlpool (Findlay Division), which is a manufacturer of household (large) appliances, which includes primarily 'surface coating' operations and other operations involving natural and synthetic organic-compound materials, which have primarily organic compound air emissions.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461



Statement of Basis For Air Pollution Title V Permit

Facility ID:	0332010170
Facility Name:	Whirlpool Findlay Division
Facility Description:	Household Appliances
Facility Address:	4901 North Main Street, Findlay, OH 45840
Permit #:	P0109183, Renewal
<p>This facility is subject to Title V because it is major for:</p> <p> <input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input type="checkbox"/> Carbon Monoxide <input checked="" type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input type="checkbox"/> Single Hazardous Air Pollutant <input type="checkbox"/> Combined Hazardous Air Pollutants <input type="checkbox"/> Maximum Available Control Technology Standard(s) </p>	

A. Standard Terms and Conditions

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



Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	B003 - (PTI P0108869 issued October 18, 2011) K012 - (PTI P0108870 issued October 18, 2011) K007 - (PTI 03-17356 as modified May 3, 2011) K008 - (PTI 03-17356 as modified May 3, 2011) K014 - NIDA Tub Mastic Oven - Wrapper (side panels) (PTI P0104743 issued 16 Dec 2009)

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745-)	Other	
B.2		40 CFR 63	40 CFR 63.4080 et seq. (MACT Subpart NNNN--NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS: SURFACE COATING OF LARGE APPLIANCES)
B.3		40 CFR 63	40 CFR 63.7480 et seq. (MACT Subpart DDDDD--NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS AND PROCESS HEATERS) (U.S. EPA Stay)
B.4	77-07(A)(13)		Lists insignificant emission units that have one or more applicable requirements.

C. Emissions Unit Terms and Conditions

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

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
B003	2.09 lbNOx/hr, 9.15 ton NOx/yr		31-05	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' AP-42 emission factor calculation at maximum capacity determines compliance.
B003	1.10 lb CO/hr, 4.82 ton CO/yr		31-05	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' AP-42 emission factor calculation at maximum capacity determines compliance.
B003	0.25 lb PE/hr, 1.10 ton PE/yr		31-05	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' AP-42 emission factor calculation at maximum capacity determines compliance.
B003	0.020 lb PE /mmBtu	17-10 (B)(1)		N	N	Y	N	N	Y	N	Y	N	N	N	M - Tracking for any day where a fuel that is not an 'inherently clean fuel' was used. ET - None - 'Static' AP-42 emission factor calculation at maximum capacity determines compliance.
B003	20% opacity	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	N	N	OR - Must use natural gas or No. 2 fuel oil (i.e. 'inherently clean fuel' for PE) M - Tracking for any day where a fuel that is not an 'inherently clean fuel' was used. ET - None normally required for opacity alone.
K003 K007 K008 K012	1.10 lb HAP /gal solids		40 CFR 63.4090 (a)	N	N	N	N	N	Y	N	Y	N	N	N	M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination.
K011	3.16 lb VOC /hr, 13.9 ton VOC /yr		31-05	N	N	N	N	N	Y	N	Y	N	N	N	M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination, for annual limit. (Hourly VOC limit is based on Potential to Emit.)



K012	0.51 lb PM10/hr, 2.25 ton PM10/yr		31-05	N	N	Y	N	N	Y	N	Y	N	N	N	M - Baghouse pressure drop monitoring. ET - None - per Ohio EPA Engineering Guide 16
K012	0.46 lbNOx/hr, 2.01 ton NOx/yr		31-05	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' AP-42 emission factor calculation at maximum capacity determines compliance.
K012	0.39 lb CO/hr, 1.71 ton CO/yr		31-05	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET - None - 'Static' AP-42 emission factor calculation at maximum capacity determines compliance.
K012	0% opacity		31-05	N	N	Y	N	N	Y	N	Y	N	N	N	M - Baghouse pressure drop monitoring for PE also serves as monitoring for opacity. ET - None normally required for opacity alone.
K007 K008	0.89 lb VOC /hr, 3.90 ton VOC /yr *		31-05	N	N	Y	N	N	Y	N	Y	N	Y	N	M - Thermal oxidizer temperature monitoring. * Adhesion Promoter (each emissions unit)
K007 K008	4.02 lb OC /hr, 17.6 ton OC /yr *		31-05	N	N	N	N	N	Y	N	Y	N	Y	N	M - Thermal oxidizer temperature monitoring. * Adhesion Promoter (each emissions unit)
K007 K008	0.17 lb VOC /hr, 0.74 ton VOC /yr *		31-05	N	N	Y	N	N	Y	N	Y	N	N	N	M - Scrubber pressure drop monitoring. ET - None - per Ohio EPA Engineering Guide 16 * Powder Coating (each emissions unit)
K007 K008	0.17 lb PM10/hr, 0.74 ton PM10/yr *		31-05	N	N	N	N	N	Y	N	Y	N	N	N	M - Scrubber pressure drop monitoring. ET - None - per Ohio EPA Engineering Guide 16 * Powder Coating (each emissions unit)
K007 K008	3.19 lb CO/hr, 14.0 ton CO/yr *		31-05	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp - None - 'Static' emission factor calculation at maximum capacity determines compliance. ET - None - per Ohio EPA Engineering Guide 16 * Combustion Emissions from Ovens and Thermal Oxidizer (K007 and K008 combined)
K007	4.23		31-05	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp - None - 'Static' emission factor calculation



K008	lbNOx/hr, 18.5 ton NOx/yr *														at maximum capacity determines compliance. ET - None - per Ohio EPA Engineering Guide 16 * Combustion Emissions from Ovens and Thermal Oxidizer (K007 and K008 combined)
K007 K008	0.18 lb VOC /hr, 0.79 ton VOC /yr *		31-05	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp - None - 'Static' emission factor calculation at maximum capacity determines compliance. ET - None - per Ohio EPA Engineering Guide 16 * Combustion Emissions from Ovens and Thermal Oxidizer (K007 and K008 combined)
K007 K008	0.24 lb PM10/hr, 1.05 ton PM10/yr *		31-05	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp - None - 'Static' emission factor calculation at maximum capacity determines compliance. ET - None - per Ohio EPA Engineering Guide 16 * Combustion Emissions from Ovens and Thermal Oxidizer (K007 and K008 combined)
K007 K008	7.51 lb VOC /gal solids		40 CFR 63.4090 (a)	N	N	N	N	N	Y	N	Y	N	N	N	M - Material tracking information allows for direct mass balance calculation of emissions. CEMS would therefore be unnecessary. ET - None - Mass balance from MR&R used as compliance determination.
K007 K008 K012	N/A	17-11(A)		Y	N	N	N	N	N	N	N	N	N	N	ND - The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).
K007 K008 K012	N/A	17-07(A)		Y	N	N	N	N	N	N	N	N	N	N	ND - This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.
K007 K008 K012	N/A		40 CFR 60.450 NSPS Sub SS	Y	N	N	N	N	N	N	N	N	N	N	Powder coatings are excluded from "organic coatings" as defined in 40 CFR 60.451, and NSPS Subpart SS is therefore not applicable to this emissions unit. - for K007 and K008, for powder coatings only



DRAFT

**Division of Air Pollution Control
Title V Permit
for
Whirlpool Findlay Division**

Facility ID:	0332010170
Permit Number:	P0109183
Permit Type:	Renewal
Issued:	3/2/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Whirlpool Findlay Division

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Authorization

Facility ID: 0332010170
Facility Description: Household Appliances
Application Number(s): A0018018, A0037597, A0043320
Permit Number: P0109183
Permit Description: Title V permit renewal for Whirlpool (Findlay Division), which is a manufacturer of household (large) appliances, which includes primarily 'surface coating' operations and other operations involving natural and synthetic organic-compound materials, which have primarily organic compound air emissions.
Permit Type: Renewal
Issue Date: 3/2/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0087107

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

Whirlpool Findlay Division
4901 North Main Street
Findlay, OH 45840

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

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

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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

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

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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

Effective Date: To be entered upon final issuance

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

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

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

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

insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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

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

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

- (4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

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

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

3. Scheduled Maintenance

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

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

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:



- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

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

5. Title IV Provisions

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

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

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

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

7. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the

Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
- (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

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

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

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. An identification of each term or condition of this permit that is the basis of the certification.
 - b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

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

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

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

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

23. Title VI Provisions

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

- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

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

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

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

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

27. Scheduled Maintenance/Malfunction Reporting

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

28. Permit Transfers

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

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions



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

a) None.

2. The following emissions unit(s) is subject to 40 CFR, Part 63, Subpart NNNN: significant emissions units K003, K007, K008, and K012; and insignificant emissions units P013 and T004. The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

Since this facility complies by the “compliant material option” and/or the “emission rate without add-on controls option”, emissions units P013 and T004 are not subject to any ‘work practice standards’ under 40 CFR 63.4093 of Subpart NNNN.

3. The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart DDDDD, in accordance with 40 CFR Parts 63.7480 through 63.7575 (including the Table(s) and Appendix(ices) referenced in Subpart DDDDD).

The following emissions units in this permit are subject to the aforementioned requirements: B004, B005, B006, B007, B008, and B009.

(Authority for term: 40 CFR Part 63)

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

- B004 - New Boiler #1 232598 7.53 MM-BTU/hr -n.g.
- B005 - New Boiler #2 232599 7.53 MM-BTU/hr -n.g.
- B006 - New Boiler #3 225264 7.53 MM-BTU/hr -n.g.
- B007 - New Boiler #4 225265 7.53 MM-BTU/hr -n.g.
- B008 - New Boiler #5 225266 7.53 MM-BTU/hr -n.g.
- B009 - New Boiler #6 225267 7.53 MM-BTU/hr -n.g.
- F001 - Unpaved Roads and Parking Areas
- K010 - Door Mastic (asphaltic ‘sheets’) Oven Operations
- K014 - NIDA Tub Mastic Oven - Wrapper (side panels) (PTI P0104743 issued 16 Dec 2009)
- L002 - Maintenance Parts Washers /Cold Cleaners
- P012 - NIDA alkaline detergent parts washer with natural gas fired heater
- P013 - Paint Mix Room (associated with K003)
- P015 - Maintenance Painting Operations
- P017 - Plastic Injection Molding Presses
- P018 - Plastic Regrind
- P019 - Assembly (cardboard) Carton Sealers - with Hot Melt Glue
- P020 - Back-up IC Engine/Generator

Effective Date: To be entered upon final issuance

P022 - Miscellaneous Air Makeup Units - n.g.

P026 - Panel Assembly - adhesive caulking

T003 - Storage Tank - 200,000 gallon - Diesel - Fixed Roof

T004 - Paint Storage Tank- 5100 gallons - with Submerged Fill (associated with K003)

C. Emissions Unit Terms and Conditions



1. B003, Paint System Air Makeup

Operations, Property and/or Equipment Description:

air make-up unit - 12.4 mmBtu/hr (natural gas)

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) (PTI P0108869 issued October 18, 2011)	2.09 lbs nitrogen oxides (NO _x) /hr; 9.15 tons NO _x /yr 1.10 lbs carbon monoxide (CO) /hr; 4.82 tons CO /yr 0.25 lb particulate emissions (PE) /hr; 1.10 tons PE /yr See b)(2)a.
b.	OAC rule 3745-17-10 (B)(1)	0.020 lb PE/mmBtu of actual heat input
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-10(B)(1).

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.
[OAC rule 3745-77-07(A)(1) and PTI P0108869]



d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
[OAC rule 3745-77-07(C)(1) and PTI P0108869]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.
[OAC rule 3745-77-07(C)(1) and PTI P0108869]
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
[OAC rule 3745-15-03(A)]

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:
2.09lbsNO_x/hr

Applicable Compliance Method:

Compliance may be determined by multiplying the hourly heat input (mmBtu/hr) by the emission factor for natural gas [from AP-42, Section 1.4, Table 1.4-1 (revised 7/98)] of 0.10 lb NO_x /mmBtu.

If required, compliance with the hourly limitation above shall be based upon the results of emission testing conducted in accordance with 40 CFR 60, Appendix A, Methods 1-4 and 7.

[OAC rule 3745-77-07(C)(1) and PTI P0108869]

- b. Emission Limitation:
1.10lbsCO /hr

Applicable Compliance Method:

Compliance may be determined by multiplying the hourly heat input (mmBtu/hr) by the emission factor for natural gas [from AP-42, Section 1.4, Table 1.4-1 (revised 7/98)] of 0.084 lb CO /mmBtu.

If required, compliance with the hourly limitation above shall be based upon the results of emission testing conducted in accordance with 40 CFR 60, Appendix A, Methods 1-4 and 10.

[OAC rule 3745-77-07(C)(1) and PTI P0108869]



- c. Emission Limitation:
0.25 lb PE /hr

Applicable Compliance Method:

Compliance may be determined by multiplying the hourly heat input (mmBtu/hr) by the emission factor for natural gas [from AP-42, Section 1.4, Table 1.4-2 (revised 7/98)] of 0.0076 lb PE /mmBtu.

If required, compliance with the hourly limitation above shall be based upon the results of emission testing conducted in accordance with 40 CFR 60, Appendix A, Methods 1-5.

[OAC rule 3745-77-07(C)(1) and PTI P0108869]

- d. Emission Limitation:
0.020 lb PE per mmBtu actual heat input

Applicable Compliance Method:

If required, compliance with the limitation above shall be based upon the results of emission testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

[OAC rule 3745-77-07(C)(1) and PTI P0108869]

- e. Emission Limitations:
9.15 tons NO_x /year
4.82 tons CO /year
1.10 tons PE /year

Applicable Compliance Method:

The annual allowable limitations were developed by multiplying the hourly emission limitations by 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitations, compliance with the annual emission limitations shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0108869]

- f. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI P0108869]

- g) Miscellaneous Requirements

- (1) None.



2. K003, Electrocoat Prime Coat and Ransburg Finish Paint System

Operations, Property and/or Equipment Description:

Electrocoat Prime Coat and Ransburg Finish Paint System

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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.	40 CFR 63.4080 et seq. (MACT Subpart NNNN)	Organic hazardous air pollutants (HAPs) shall not exceed 0.13 kg/liter (1.10 pounds per gallon) of coating solids used during each compliance period. [40 CFR 63.4090(a)]
b.	40 CFR Part 63.1-15	Table 2 to Subpart NNNN of 40 CFR Part 63 – Applicability of General Provisions to Subpart NNNN shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
c.	OAC rule 3745-21-09(K)(1)	See b)(2)a.

(2) Additional Terms and Conditions

a. This emissions unit was installed prior to October 19, 1979 and is located at the "Whirlpool Corporation (Findlay Division)." Therefore, in accordance with OAC rule 3745-21-09(K)(4), the provisions of OAC rule 3745-21-09(K)(1) are not applicable to this emissions unit as long as a "modification" to this emissions unit does not occur.

c) Operational Restrictions

(1) The permittee shall comply with the application restrictions required under 40 CFR Part 63 Subpart NNNN, including the following sections:

63.4100(a) – (e)	general compliance requirements
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[OAC rule 3745-77-07(A)(1)]



d) Monitoring and/or Recordkeeping Requirements

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

63.4130(a)	record of notification reports
63.4130(b)	record of manufacturer's data
63.4130(c)	record of HAP emission calculations
63.4130(d)	record of coating, thinner, and cleaning material
63.4130(e)	record of mass fraction of organic HAP for each coating, thinner, and cleaning material
63.4130(f)	record of volume fraction of coating solids
63.4130(g)	record of the density of each coating, thinner, and cleaning material
63.4130(h)	records of waste materials
63.4130(j)	records of deviations
63.4131(a) – (c)	maintenance of records

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as are required pursuant to 40 CFR Part 63 Subpart NNNN, per the following sections:

63.4120(a)	semiannual compliance report
63.4120(b)	content of semiannual reports
63.4120(c)	submission of deviation reports
63.4120(d)	Submission of deviation reports

[OAC rule 3745-77-07(C)(1)]

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

[OAC rule 3745-15-03(A)]

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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 HAPs shall not exceed 0.13 kg/liter (1.10 pounds per gallon) of coating solids used during each compliance period

Applicable Compliance Method:

Emission rate without add-on control option: Compliance shall be demonstrated in accordance with 63.4151 – Equations 1 and 1A through 1C and, if applicable, 63.4151(e)(4); 63.4151 Equation 2; and 63.4151 Equation 3.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

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3. K011, North end SS shear coater

Operations, Property and/or Equipment Description:

metal coil surface coating (light oil/emulsion applied, to assist the metal forming processes)

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) (PTI 03-13441 issued July 13, 2000)	3.16 lbsvolatile organic compounds (VOC) /hr; 13.85 tons VOC /yr

(2) Additional Terms and Conditions

a. The hourly VOC emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

- a. the name and identification number of each coating, as applied;
- b. the VOC content of each coating, as applied;
- c. the number of gallons of each coating employed;
- d. the total VOC emission rate for all coatings, in pounds per month [d)(1)b. x d)(1)c., for each coating]; and
- e. the annual, year-to-date VOC emissions from all coating usage [sum of d)(1)d. for each calendar month, to date from January to December].

[OAC rule 3745-77-07(C)(1) and PTI 03-13441]

e) Reporting Requirements

(1) The permittee shall submit annual reports that summarize the total annual actual VOC emissions from the coating operations. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI 03-13441]

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

[OAC rule 3745-15-03(A)]

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 Limitations:

3.16 lbs VOC /hr; 13.85 tons VOC /yr

Applicable Compliance Method:

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

The record keeping requirements in d)(1) shall be used to determine compliance with the annual emission limitation.

*The hourly potential to emit for this emissions unit was based on the maximum VOC content of 0.51 pound per gallon and a maximum usage rate of 6.2 gallons/hour.

[OAC rule 3745-77-07(C)(1) and PTI 03-13441]

g) Miscellaneous Requirements

(1) The material applied in this emissions unit is not a "surface coating" as defined in the federally-enforceable SIP/RACT or NSPS or MACT regulations.

4. K012, Nylon Dishrack Coating Line

Operations, Property and/or Equipment Description:

powder coating line (nylon dishracks) - with baghouse, and with curing oven and other process heating (n.g.)

- 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 (F) (PTI P0108870 issued October 18, 2011)	<u>Powder Coating Baghouse:</u> 0.51 lb particulate matter 10 microns or less in size (PM ₁₀) per hour; 2.25 tons of PM ₁₀ per year Visible particulate emissions shall not exceed 0% as a six-minute average. See b)(2)a. and c)(1).
b.	OAC rule 3745-31-05 (A)(3), as effective 11/30/01	<u>Curing Oven:</u> 0.46 lb nitrogen oxides (NO _x) /hr; 2.01 tons NO _x /yr 0.39 lb carbon monoxide (CO) /hr; 1.71 tons CO /yr See b)(2)b. and b)(2)e.
c.	OAC rule 3745-31-05(A)(3), as effective 12/1/2006	See b)(2)c. and b)(2)d.
d.	OAC rule 3745-17-11(B)	See b)(2)f.
e.	OAC rule 3745-17-07(A)	See b)(2)g.
f.	40 CFR 63.4080 et seq. (MACT Subpart NNNN)	Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.10 pounds per gallon) of coating solids used during each compliance period [40 CFR 63.4090(a)]
g.	40 CFR Part 63.1-15	Table 2 to Subpart NNNN of 40 CFR Part 63 – Applicability of General Provisions to

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Subpart NNNN shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE). The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in section c)(1) which include particulate control measures (i.e. baghouse /fabric filter):

- i. 0.51 lb PM₁₀ per hour; 2.25 tons of PM₁₀ per year.
- ii. avisible emission limitation of 0% opacity, as a six-minute average.

The potential to emit (PTE) for this emissions unit is 2.25 tons PM₁₀ per year. The annual PTE was determined by multiplying the following: a maximum outlet concentration of 0.01 grain PM₁₀/dscf, a maximum volumetric air flow rate of 6000 acfm, a maximum operating schedule of 8760 hours/year, and conversion factors of 1 lb/7000 grains, 1 dscf/1 acfm, 60 min/1 hour, and 1 ton/2000 lbs.

b. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [see b)(2)a.]. The voluntary restrictions were intentionally established to be consistent with the BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 for two specific purposes as indicated below:

- i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with the voluntary restrictions;
- ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [see b)(2)d.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the

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December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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

- c. This rule applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3)(a) do not apply to the emissions of NO_x and CO since the potential to emit is less than 10 tons per year for each pollutant.

- d. The BAT requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. PE (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.
- e. The requirements of this rule also include compliance with 40 CFR Part 63 Subpart NNNN. Organic emissions are negligible and no OC emission limitation has been established under OAC 3745-31-05(A)(3), nor is OAC rule 3745-21-09(K)(1) considered to apply to this emissions unit.
- f. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs / hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Hancock County.
- g. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- h. Powder coatings are excluded from "organic coatings" as defined in 40 CFR 60.451, and NSPS Subpart SS is therefore not applicable to this emissions unit.
- i. The NO_x and CO emission limitations represent the potential to emit for this emissions unit. Therefore, no monitoring, recordkeeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

c) Operational Restrictions

- (1) The following operational restriction(s) have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.]: 0.01 grain of particulate matter 10 microns or less in size (PM₁₀) per dry standard cubic foot (dscf) from the baghouse exhaust. [OAC rule 3745-77-07(A)(1) and PTI P0108870]

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- (2) The permittee shall comply with the application restrictions required under 40 CFR Part 63 Subpart NNNN, including the following sections:

63.4100(a) – (e)	general compliance requirements
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[OAC rule 3745-77-07(A)(1) and PTI P0108870]

d) Monitoring and/or Recordkeeping Requirements

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

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 0.5 to 8.0 inches of water.

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

[OAC rule 3745-77-07(C)(1) and PTI P0108870]



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- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63 Subpart NNNN, including the following sections:

63.4130(a)	record of notification reports
63.4130(b)	record of manufacturer's data
63.4130(c)	record of HAP emission calculations
63.4130(d)	record of coating, thinner, and cleaning material
63.4130(e)	record of mass fraction of organic HAP for each coating, thinner, and cleaning material
63.4130(f)	record of volume fraction of coating solids
63.4130(g)	record of the density of each coating, thinner, and cleaning material
63.4130(h)	records of waste materials
63.4130(j)	records of deviations
63.4131(a) – (c)	maintenance of records

[OAC rule 3745-77-07(C)(1) and PTI P0108870]

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the baghouse(s) was outside the acceptable range(s);
 - b. an identification of each incident of deviation described in e)(1)a above where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in e)(1)a where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range(s), was determined to be necessary and was not taken; and

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- d. an identification of each incident of deviation described in e)(1)a where proper records were not maintained for the investigation and/or the corrective action.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

[OAC rule 3745-77-07(C)(1) and PTI P0108870]

- (2) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as are required pursuant to 40 CFR Part 63 Subpart NNNN, per the following sections:

63.4120(a)	semiannual compliance report
63.4120(b)	content of semiannual reports
63.4120(c)	submission of deviation reports
63.4120(d)	Submission of deviation reports

[OAC rule 3745-77-07(C)(1) and PTI P0108870]

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

[OAC rule 3745-15-03(A)]

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 Limitations:
 0.51 lb PM₁₀ per hour; 2.25 tons of PM₁₀ per year

Applicable Compliance Method:

The hourly emission limitation was determined by multiplying the maximum outlet concentration of 0.01 grain PM₁₀ /dscf by a maximum volumetric air flow rate of 6000 acfm, and using conversion factors of 60 min/1 hour and 1 lb/7000 grains.

The 0.01 grain of PM₁₀ /dscf emission limitation was established in accordance with manufacturer's specifications for the maximum outlet grain loading

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concentration for this fabric filter. Provided compliance is shown with the grains PM_{10} /dscf limitation, compliance with the hourly PM_{10} limitation shall also be demonstrated.

If required, the permittee shall demonstrate compliance testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A, and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The annual allowable PM_{10} limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0108870]

- b. Emission Limitation:
0.46lb NO_x /hr

Applicable Compliance Method:

The emission limitation was established by multiplying the maximum gas burning capacity of the emissions unit (4.6 mmBtu/hr) by the emission factor for natural gas [from AP-42, Section 1.4, Table 1.4-1 (revised 7/98)] of 0.10 lbs NO_x /mmBtu.

If required, compliance with the hourly limitation above shall be based upon the results of emission testing conducted in accordance with 40 CFR 60, Appendix A, Methods 1-4 and 7.

[OAC rule 3745-77-07(C)(1) and PTI P0108870]

- c. Emission Limitation:
0.39lbCO /hr

Applicable Compliance Method:

The emission limitation was established by multiplying the maximum gas burning capacity of the emissions unit (4.6 mmBtu/hr) by the emission factor for natural gas [from AP-42, Section 1.4, Table 1.4-1 (revised 7/98)] of 0.084 lbs CO /mmBtu.

If required, compliance with the hourly limitation above shall be based upon the results of emission testing conducted in accordance with 40 CFR 60, Appendix A, Methods 1-4 and 10.

[OAC rule 3745-77-07(C)(1) and PTI P0108870]

- d. Emission Limitations:
2.01 tons NO_x /year
1.71 tons CO /year

Applicable Compliance Method:

The annual allowable emission limitations were developed by multiplying the hourly emission limitations by 8760 hrs/yr, and then dividing by 2000 lbs/ton.

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Therefore, provided compliance is shown with the hourly emission limitations, compliance with the annual emission limitations shall also be demonstrated.
[OAC rule 3745-77-07(C)(1) and PTI P0108870]

e. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the visible particulate limitation shall be determined in accordance with 40 CFR 60, Appendix A, Method 9.
[OAC rule 3745-77-07(C)(1) and PTI P0108870]

f. Emission Limitation:

Organic HAPs shall not exceed 0.13 kg/liter (1.10 pounds per gallon) of coating solids used during each compliance period

Applicable Compliance Method:

Emission rate without add-on control option: Compliance shall be demonstrated in accordance with 63.4151 – Equations 1 and 1A through 1C and, if applicable, 63.4151(e)(4); 63.4151 Equation 2; and 63.4151 Equation 3.
[OAC rule 3745-77-07(C)(1) and PTI P0108870]

g) Miscellaneous Requirements

(1) None.

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5. Emissions Unit Group -Dishrack Powder Coating Lines: K007,K008,

EU ID	Operations, Property and/or Equipment Description
K007	East metal dishrack coating line - with Thermal Oxidizer
K008	West metal dishrack coating line - with Thermal Oxidizer

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 03-17356 as modified May 3, 2011)	<p>See b)(2)a. and b)(2)i.</p> <p><u>Adhesion Promoter Emissions:</u> 0.89 lb volatile organic compounds (VOC) /hour; 3.90 tons VOC /year (for each emissions unit)</p> <p>4.02 lbs organic compounds (OC) /hour; 17.60 tons of OC /year (for each emissions unit)</p> <p><u>Powder Coating Emissions:</u> 0.17 lb VOC /hour; 0.74 ton VOC /year (for each emissions unit)</p> <p>0.17 lb particulate matter 10 microns or less in size (PM₁₀) /hour; 0.74 ton PM₁₀ /year (for each emissions unit) [see b)(2)d.]</p> <p><u>Combustion Emissions from Ovens and Thermal Oxidizer:</u> Combined emissions from K007 and K008 shall not exceed 3.19 lbs of carbon monoxide (CO) /hour and 13.97 tons of CO/year.</p>

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Combined emissions from K007 and K008 shall not exceed 4.23 lbs of nitrogen oxides (NO_x) /hour and 18.53 tons of NO_x /year.</p> <p>Combined emissions from K007 and K008 shall not exceed 0.18lb of VOC /hour and 0.79 ton of VOC /year.</p> <p>Combined emissions from K007 and K008 shall not exceed 0.24 lb of PM₁₀ /hour and 1.05 tons of PM₁₀ /year.</p>
b.	OAC rule 3745-21-09(K)(1)	See b)(2)e.
c.	OAC rule 3745-21-09(B)(6)	See b)(2)f.
d.	OAC rule 3745-17-11(A)	None (see b)(2)g.)
e.	OAC rule 3745-17-07(A)	None (see b)(2)h.)
f.	40 CFR 60.450 et seq. (NSPS Subpart SS)	<p>The permittee shall not discharge or cause the discharge of VOC emissions that exceed 0.90 kilogram of VOCs per liter of applied coating solids [7.51 lbs of VOC per gallon of applied coating solids] from any surface coating operation on a large appliance surface coating line. [40 CFR 60.452]</p> <p>(see b)(2)k.)</p>
g.	40 CFR 63.4080 et seq. (MACT Subpart NNNN)	<p>Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.10 pounds per gallon) of coating solids used during each compliance period [40 CFR 63.4090(a)]</p>
h.	40 CFR Part 63.1-15	Table 2 to Subpart NNNN of 40 CFR Part 63 – Applicability of General Provisions to Subpart NNNN shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) control requirements for this emissions unit has been determined to be the following:
 - i. use of a thermal oxidizer achieving a minimum overall control efficiency of 87% (minimum of 90% destruction) for OC emissions from adhesion promoter coating and drying operations; and

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- ii. use of a 2-stage packed bed wet scrubber followed by a cyclonic scrubber/mist eliminator achieving a 95% control efficiency for particulate matter and VOC emissions from post-cure powder coat curing oven.
- b. When the cyclonic scrubber/mist eliminator is shut down for unscheduled maintenance* or other operational reasons while this emissions unit is in operation, the emissions unit shall be controlled by the 2-stage packed bed scrubber. Downtime of the cyclonic scrubber/mist eliminator while this emissions unit is in operation shall not exceed 72 hours per year.
- c. All OC emission limitations are inclusive of VOC emissions.
- d. All emissions of particulate matter are PM₁₀.
- e. The requirements of OAC rule 3745-21-09(K)(1) apply to the powder coating operations of the dishrack coating line. OAC rule 3745-21-09(K)(1) requires that VOC emissions shall not exceed 2.8 lbs per gallon of coating, excluding water and exempt solvents.
- f. The requirements of OAC rule 3745-21-09(B)(6) apply to the adhesion promoter operations of the dishrack coating line. In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (K) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(A)(3).
- g. The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Hancock County.
- h. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- i. The requirements of this rule also include compliance with 40 CFR Part 60 Subpart SS and 40 CFR Part 63 Subpart NNNN.
- j. The following emission limitations represent the potential to emit for this emissions unit from the respective processes. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations:
 - i. Adhesion Promoter Operations:
 - (a) 0.89 lb of VOC /hour
 - (b) 4.02 lbs of OC /hour

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ii. Combustion Emissions from Ovens and Thermal Oxidizer from emissions unit K007 & K008 combined:

(a) 3.19 lbs of CO /hour

(b) 4.23 lbs of NO_x /hour

k. The emission limitation of 0.90 kg of VOC/liter of applied coating solids applies only to the portion of the dishrack coating line associated with adhesion promoter coating operations. The powder coating operations of the dishrack coating line are exempt from the requirements of 40 CFR Part 60 Subpart SS.

c) Operational Restrictions

(1) The unscheduled downtime of the cyclonic scrubber/mist eliminator shall not exceed 72 hours per year (while this emissions unit is operating).

[OAC rule 3745-77-07(A)(1) and PTI 03-17356]

(2) The permittee shall comply with the application restrictions required under 40 CFR Part 63 Subpart NNNN, including the following sections:

63.4100(a) – (e)	general compliance requirements
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[OAC rule 3745-77-07(A)(1) and PTI 03-17356]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure of the feed water for the 2-stage packed bed scrubber and the pressure drop across the cyclonic scrubber/mist eliminator (in inches of water) during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the following ranges/values: the pressure of the feed water for the 2-stage packed bed scrubber and the pressure drop across the cyclonic scrubber/mist eliminator once each day that the line is operating.

Whenever the monitored value deviates from the ranges/values specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at the time; the date(s) the investigation was conducted; the name(s) of the personnel who conducted the investigation; and the findings and recommendations.

In response to each required investigation to determine the cause of the deviation, the permittee shall take prompt corrective action to bring the control equipment within the acceptable ranges/values specified below unless the permittee determines the corrective action is not necessary and documents the reasons for that determination, along with the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action; the



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date it was completed; the date and time the deviation ended; the total period of time (in minutes) during which there was a deviation; the feed water pressure and/or pressure drop reading immediately after the corrective action was taken; and the name(s) of the personnel who performed the work.

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

The acceptable ranges/values for the 2-stage packed bed scrubber and cyclonic scrubber/mist eliminator are as follows:

2-stage packed bed scrubber:	the feed water pressure shall not exceed 20 psi at any time
cyclonic scrubber/mist eliminator:	10 – 25 inches of water

The ranges/values are effective for the duration of this permit unless revisions are requested by the permittee and approved in writing by the Northwest District Office. The permittee may request revisions to the permitted feed water pressure and pressure drop ranges/values based upon information obtained during future emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the ranges/values will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

[OAC rule 3745-77-07(C)(1) and PTI 03-17356]

- (2) The permittee shall maintain monthly records of the number of hours the cyclonic scrubber/mist eliminator was shut down while this emissions unit was in operation (in hours per month and total hours, to date, for the calendar year).

[OAC rule 3745-77-07(C)(1) and PTI 03-17356]

- (3) The permittee shall perform daily checks of emissions of the bypass vent serving the 2-stage packed bed scrubber when the cyclonic scrubber/mist eliminator is shut down and the emissions unit is operating. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative or normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI 03-17356]

- (4) The permittee shall conduct an initial performance test as required under 40 CFR Part 60.8(a) and thereafter a performance test each calendar month for each affected facility according to the procedures in d)(5) below.
[OAC rule 3745-77-07(C)(1), PTI 03-17356, and 40 CFR Part 60.453(b)]
- (5) The permittee shall use the following procedures for any affected facility that uses a capture system and a control device that destroys VOCs to comply with the emission limit of 0.90 kilogram of VOC per liter of applied coating solids:
 - a. Determine the overall reduction efficiency (R) for the capture system and control device. For the initial performance test the overall reduction efficiency (R) shall be determined as prescribed in i., ii., and iii. below, shall be repeated when directed by Ohio EPA or when the owner or operator elects to operate the control device or capture system at conditions different from the initial performance test.
 - i. Determine the fraction (F) of total VOCs emitted by an affected facility that enters the control device using equation (6) in 40 CFR Part 60.453(b)(2)(i)(A).
 - ii. Determine the destruction efficiency of the control device (E) using values of the volumetric flow rate of each of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by using equation (7) in 40 CFR Part 60.453(b)(2)(i)(B).
 - iii. Determine overall reduction efficiency (R) using the equation in 40 CFR Part 60.453(b)(2)(i)(C).
 - b. Calculate the volume-weighted average of the total mass of VOCs per unit of volume of applied coating solids (G) during each calendar month for each affected facility using equations (1), (2), (3) if applicable, and (4) in 40 CFR Part 60.453(b)(1).
 - c. Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month by using equation (9) of 40 CFR Part 60.453(b)(2)(iii) as follows:

$$N=G(1-R)$$

Note: G is equal to equation (4), as per 40 CFR Part 60.453(b)(1)(i)(D)

- d. If the volume-weighted average mass of VOCs emitted to the atmosphere for each calendar month (N) is equal to or less than 0.90 kilogram per liter of applied coating solids, the affected facility is in compliance.

[OAC rule 3745-77-07(C)(1) and PTI 03-17356]

- (6) The permittee shall demonstrate compliance with the 2.8 lbs of VOC/gallon of coating, excluding water and exempt solvents, by collecting and recording the following information each month for the powder coating operations, as per OAC rule 3745-21-10(B)(8):

- a. the name and identification number of each coating, as applied; and
- b. the mass of VOC per volume of each coating, excluding water and exempt solvents, as applied, calculated as follows:

$C_{VOC,2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$$C_{VOC,2} = (D_c)(W_{VOC})/V_s + V_{VOC}$$

where

D_c = the density of the coating, in pounds per gallon of coating

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

V_s = the volume fraction of solids in coating, in gallons of solids per gallon of coating

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating

W_W = weight fraction of water in coating, in pound of water per pound of coating

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating

V_W = volume fraction of water in coating, in gallon of water per gallon of coating

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating

[OAC rule 3745-77-07(C)(1) and PTI 03-17356]

- (7) The permittee shall determine the annual OC and VOC emissions from the adhesion promoter coating operations by collecting and recording the following information each month for adhesion promoter coating operations:
- a. the name and identification number of each coating, as applied;
 - b. the number of gallons of each coating employed;
 - c. the OC and VOC contents of each coating employed, in pounds per gallon, as applied;
 - d. the total uncontrolled OC and VOC emission rate for all coatings, in pounds per month, calculated using the overall control efficiency from the most recent performance test demonstrating that the emissions unit was in compliance $\{[\text{summation of (b x c) for all coatings}] \times (1 - \text{overall control efficiency})\}$; and
 - e. the annual, year-to-date, OC and VOC emissions from all coatings employed [sum of (d) for each calendar month to date from January to December].
[OAC rule 3745-77-07(C)(1) and PTI 03-17356]
- (8) The permittee shall determine the annual VOC emissions from the powder coating operations by collecting and recording the following information each month:
- a. the name and identification number of each powder coating employed;
 - b. the number of gallons of each powder coating employed;
 - c. the VOC content, in pounds per gallon, of each powder coating employed;
 - d. the total controlled VOC emission rate for all powder coatings, in pounds per month, calculated using the overall control efficiency from the most recent performance test demonstrating that the emissions unit was in compliance $\{[\text{summations of (b x c) for all powder coatings}] \times (1 - \text{overall control efficiency})\}$; and
 - e. the annual, year-to-date, VOC emissions from all coatings employed [sum of (d) for each calendar month to date from January to December].
[OAC rule 3745-77-07(C)(1) and PTI 03-17356]
- (9) Each owner or operator that uses a capture system and an incinerator to comply with the emission limits specified in 40 CFR 60.452 shall install, calibrate, maintain, and operate temperature measurement devices as prescribed below:
- a. A temperature measurement device shall be installed in the firebox.
 - b. Each temperature measurement device shall be installed, calibrated, and maintained according to the manufacturer's specifications. The device shall have an accuracy of 0.75 percent of the temperature being measured, expressed in degrees Celsius, or +/- 2.5 degrees Celsius, whichever is greater.



- c. Each temperature measurement device shall be equipped with a recording device so that a permanent continuous record is produced.
[OAC rule 3745-77-07(C)(1), PTI 03-17356, and 40 CFR 60.454(a)(1) – (3)]
- (10) The permittee shall collect and record the following information for the thermal oxidizer:
 - a. All 3-hour blocks of time when the operation(s) controlled by the thermal oxidizer was/were in operation during which the average temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions tests that demonstrated the operation(s) was/were in compliance.
 - b. A log or record of the downtime for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated operation(s).
[OAC rule 3745-77-07(C)(1) and PTI 03-17356]
- (11) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63 Subpart NNNN, including the following sections:

63.4130(a)	record of notification reports
63.4130(b)	record of manufacturer's data
63.4130(c)	record of HAP emission calculations
63.4130(d)	record of coating, thinner, and cleaning material
63.4130(e)	record of mass fraction of organic HAP for each coating, thinner, and cleaning material
63.4130(f)	record of volume fraction of coating solids
63.4130(g)	record of the density of each coating, thinner, and cleaning material
63.4130(h)	records of waste materials
63.4130(j)	records of deviations
63.4131(a) – (c)	maintenance of records

[OAC rule 3745-77-07(C)(1) and PTI 03-17356]

e) Reporting Requirements

- (1) The permittee shall submit annual reports that summarize the following:
- a. the total number of hours this emissions unit was in operation when the cyclonic scrubber/mist eliminator was shut down;
 - b. the total annual VOC emissions from the powder coating operations;
 - c. the total annual actual OC emissions from adhesion promoter coating operations; and
 - d. the total annual actual VOC emissions from adhesion promoter coating operations.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI 03-17356]

- (2) The permittee shall submit quarterly reports that identify the following information concerning the operation of the 2-stage packed bed scrubber and cyclonic scrubber/mist eliminator during the operation of the controlled emissions unit:
- a. each period of time when the pressure of the feed water for the 2-stage packed bed scrubber and the pressure drop across the cyclonic scrubber/mist eliminator were not within the acceptable ranges/values contained in this permit;
 - b. an identification of each incident of deviation described in "a" above where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in "a" where prompt corrective action that would bring the feed water pressure and/or pressure drop into compliance with the acceptable ranges/values contained in this permit was determined to be necessary but was not taken; and
 - d. an identification of each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s).

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

[OAC rule 3745-77-07(C)(1) and PTI 03-17356]

- (3) The permittee shall submit quarterly reports that identify the following information concerning the operation of the thermal oxidizer during the operation of the emissions unit(s):
- a. each period of time when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;

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- b. an identification of each incident of deviation described in “a” above where a prompt investigation was not conducted;
- c. an identification of each incident of deviation described in “a” where prompt corrective action that would bring the temperature into compliance with the acceptable range was determined to be necessary and was not taken; and
- d. an identification of each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
[OAC rule 3745-77-07(C)(1) and PTI 03-17356]

- (4) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the bypass vent of the 2-stage packed bed scrubbers when the cyclonic scrubber/mist eliminator was shut down while the emissions unit was operating and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Northwest District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
[OAC rule 3745-77-07(C)(1) and PTI 03-17356]
- (5) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of any noncomplying powder coating in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 45 days after the exceedance occurs.
[OAC rule 3745-77-07(C)(1) and PTI 03-17356]
- (6) The permittee shall submit quarterly reports identifying each instance in which the volume-weighted average of the total mass of VOCs emitted to the atmosphere per volume of applied coating solids (N) is greater than 0.90 kilogram of VOC per liter of applied coating solids from the adhesion promoter coating operation on a large appliance surface coating line. If no such instances have occurred, a report stating this shall be submitted to the Northwest District Office on a quarterly basis.
[OAC rule 3745-77-07(C)(1), PTI 03-17356, and 40 CFR 60.455(b)]
- (7) The owner or operator shall submit semiannual reports in accordance with 40 CFR 60.7(c) identifying each 3-hour period of coating operation during which the average temperature of the thermal oxidizer was more than 28°C (50°F) below the average temperature of the device during the most recent performance test at which destruction efficiency was determined as specified under 60.453.
[OAC rule 3745-77-07(C)(1), PTI 03-17356, and 40 CFR 60.455(c)]
- (8) Each owner or operator shall maintain for a period of at least 2 years records of all data and calculations used to determine VOC emissions from K007 and K008. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain daily records of the incinerator combustion chamber temperature.
[OAC rule 3745-77-07(C)(1), PTI 03-17356, and 40 CFR 60.455(d)]

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- (9) The permittee shall submit semiannual reports and other such notifications and reports to the Northwest District Office as are required pursuant to 40 CFR Part 63 Subpart NNNN, per the following sections:

63.4120(a)	semiannual compliance report
63.4120(b)	content of semiannual reports
63.4120(c)	submission of deviation reports
63.4120(d)	Submission of deviation reports

[OAC rule 3745-77-07(C)(1) and PTI 03-17356]

- (10) All quarterly reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
 [OAC rule 3745-77-07(C)(1)]

- (11) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 [OAC rule 3745-15-03(A)]

f) Testing Requirements

- (1) 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 after issuance of the permit. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - b. The emission testing shall be conducted to demonstrate compliance with the hourly OC and VOC limitations, the minimum overall OC control efficiency of 87%, and the minimum of 90% OC destruction.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable parameters:

 pounds OC and VOC per hour: Methods 1-4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A

 minimum overall OC control efficiency of 87%, and minimum of 90% OC destruction: Methods 1-4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A; and Method 204, as specified in 40 CFR Part 51, Appendix M

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- d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the Ohio EPA, Northwest 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 Director (the Ohio EPA, Northwest District Office's) refusal to accept the results of the emission test(s).
 - f. Personnel from the Director (the Ohio EPA, Northwest 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.
 - g. 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 Director (the Ohio EPA, Northwest District Office) 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 Director (the Ohio EPA, Northwest District Office).
[OAC rule 3745-77-07(C)(1)]
- (2) 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:

Adhesion Promoter Emissions

- a. Emission Limitations:
0.89 lb VOC /hour; 3.90 tons VOC /year (each)

Applicable Compliance Method

The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

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* The potential to emit is based on a VOC content of 1.48 lbs/gallon, a maximum usage rate of 4.60 gallons/hour, and a control efficiency of 87%. The VOC content of 1.48 lbs/gallon consists of two different coating materials: ethyl lactate and the volatile portion of the adhesion enhancer. Ethyl lactate has a VOC content of 8.61 lbs/gallon and a maximum usage rate of 1.57 gallons/hour. The volatile portion of the adhesion enhancer has a VOC content of 0.03 lb/gallon and a maximum usage rate of 1.83 gallons/hour. A total of 9.20 gallons of coating materials are used each hour. Therefore, $[(0.03 \text{ lb of VOC/gal} \times 1.83 \text{ gal/hr}) + (8.61 \text{ lbs of VOC/gal} \times 1.57 \text{ gal/hr})]/9.20 \text{ gallons} = 1.48 \text{ lbs of VOC/gallon}$.

The annual emission limitation was established by multiplying the hourly limitation by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Compliance with the annual limitation shall be determined based upon the record keeping requirements specified in section d)(7) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI 03-17356]

- b. Emission Limitations:
4.02 lbs OC /hour; 17.60 tons OC/year (each)

Applicable Compliance Method

The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

* The potential to emit is based on a VOC content of 6.73 lbs/gallon, a maximum usage rate of 4.60 gallons/hour, and a control efficiency of 87%. The OC content of 6.73 lbs/gallon consists of three different coating materials: ethyl lactate, acetone, and the adhesion enhancer which has two components. Ethyl lactate has an OC content of 8.61 lbs/gallon and a maximum usage rate of 1.57 gallons/hour. Acetone has an OC content of 6.59 lbs/gallon and a maximum usage rate of 5.80 gallons/hour. The adhesion enhancer has a maximum usage rate of 1.83 gallons/hour and consists of a volatile component with an OC content of 0.03 lb/gallon and an acetone component with an OC content of 5.51 lbs/gallon. A total of 9.20 gallons of coating materials are used each hour. Therefore, $[(0.03 \text{ lb of OC/gal} + 5.51 \text{ lbs of OC/gal}) \times 1.83 \text{ gal/hr}] + [(8.61 \text{ lbs of VOC/gal} \times 1.57 \text{ gal/hr}) + [(6.59 \text{ lbs of OC/gal} \times 5.80 \text{ gal/hr})]/9.20 \text{ gallons} = 6.73 \text{ lbs of VOC/gallon}$.

The annual emission limitation was established by multiplying the hourly limitation by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Compliance with the annual limitation shall be determined based upon the recordkeeping requirements specified in section d)(7) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI 03-17356]

Powder Coating Emissions

- c. Emission Limitations:
0.17 lb VOC/hour; 0.74 ton VOC/year (each)

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

* The potential to emit is based on a VOC content of 0.173 lb/gallon, a maximum usage rate of 19.90 gallons/hour, and a control efficiency of 95%.

The annual emission limitation was established by multiplying the hourly limitation by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Compliance with the annual limitation shall be determined based upon the record keeping requirements specified in section d)(8) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI 03-17356]

- d. Emission Limitations:
0.17 lb PM₁₀ /hour; 0.74 ton PM₁₀ /year (each)

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly allowable PM₁₀ emission limitation above in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Method M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

* The potential to emit is based on a conservative assumption that all emissions of VOC will be measured as particulate matter in the form of condensable hydrocarbons by Method 202 of 40 CFR Part 51, Appendix M. Therefore, the potential to emit for PM₁₀ is equal to and calculated in the same manner as VOC.

The annual emission limitation was established by multiplying the hourly limitation by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Compliance with the annual limitation shall be determined based upon the recordkeeping requirements specified in section d)(8) of this permit.

[OAC rule 3745-77-07(C)(1) and PTI 03-17356]

- e. **Combustion Emissions from Ovens and Thermal Oxidizer**
Emission Limitations:
3.19 lbs CO /hour; 13.97 tons CO/year (K007 and K008 combined)

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 10.

* The potential to emit is based on the following information for natural gas-fired ovens and the thermal oxidizer:

Natural gas-fired ovens: the potential to emit is based on a maximum natural gas usage rate of 26500 ft³/hr and an emission factor of 84 lbs of CO/mmft³ [AP-42 Table 1.4-1 (7/98)]

Thermal oxidizer: the potential to emit is based on a manufacturer-supplied maximum exhaust concentration for CO or 75 parts per million by volume (ppmv) and a maximum volumetric flow rate of 3000 standard cubic feet per minute (scfm).

The annual emission limitation was established by multiplying the hourly limitation by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation will be assumed. [OAC rule 3745-77-07(C)(1) and PTI 03-17356]

- f. Emission Limitations:
4.23 lbs NO_x /hour; 18.53 tons NO_x /year (K007 and K008 combined)

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly allowable NO_x emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 7.

* The potential to emit is based on the following information for natural gas-fired ovens and the thermal oxidizer:

Natural gas-fired ovens: the potential to emit is based on a maximum natural gas usage rate of 26500 ft³/hr and an emission factor of 100 lbs of NO_x /mmft³ [AP-42 Table 1.4-1 (7/98)]

Thermal oxidizer: the potential to emit is based on a manufacturer-supplied maximum exhaust concentration for NO_x or 75 parts per million by volume (ppmv) and a maximum volumetric flow rate of 3,000 standard cubic feet per minute (scfm).

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The annual emission limitation was established by multiplying the hourly limitation by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation will be assumed. [OAC rule 3745-77-07(C)(1) and PTI 03-17356]

- g. Emission Limitations:
0.18 lb OC /hour; 0.79 ton OC /year (K007 and K008 combined)

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* The potential to emit is based on the following information for natural gas-fired ovens and the thermal oxidizer:

Natural gas-fired ovens: the potential to emit is based on a maximum natural gas usage rate of 26500 ft³/hr and an emission factor of 5.5 lbs of OC/mmft³ [AP-42 Table 1.4-1 (7/98)]

Thermal oxidizer: the potential to emit is based on a maximum natural gas usage rate of 5 mmBtu/hr and an emission factor of 5.5 lbs of OC/mmft³ [AP-42 Table 1.4-1 (7/98)]

The annual emission limitation was established by multiplying the hourly limitation by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation will be assumed. [OAC rule 3745-77-07(C)(1) and PTI 03-17356]

- h. Emission Limitations:
0.24 lb PM₁₀ /hour; 1.05 tons PM₁₀ /year (K007 and K008 combined)

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly allowable PM₁₀ emission limitation above in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

* The potential to emit is based on the following information for natural gas-fired ovens and the thermal oxidizer:

Natural gas-fired ovens: the potential to emit is based on a maximum natural gas usage rate of 26,500 ft³/hr and an emission factor of 7.6 lbs of PM₁₀ /mmft³ [AP-42 Table 1.4-1 (7/98)]

Effective Date: To be entered upon final issuance

Thermal oxidizer: the potential to emit is based on a maximum natural gas usage rate of 5 mmBtu/hr and an emission factor of 7.6 lbs of PM₁₀ /mmft³ [AP-42 Table 1.4-1 (7/98)]

The annual emission limitation was established by multiplying the hourly limitation by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation will be assumed. [OAC rule 3745-77-07(C)(1) and PTI 03-17356]

OAC rule 3745-21-09(K)(1)

i. Emission Limitation:

VOC emissions shall not exceed 2.8 lbs per gallon of coating excluding water and exempt solvents from powder coating operations

Applicable Compliance Method:

Compliance with the lbs per gallon of coating excluding water and exempt solvents shall be based upon the recordkeeping requirements in section d)(6). [OAC rule 3745-77-07(C)(1) and PTI 03-17356]

40 CFR Part 60 Subpart SS

j. Emission Limitation:

No owner or operator shall discharge or cause the discharge of VOC emissions that exceed 0.90 kilogram of VOCs per liter of applied coating solids [7.51 lbs of VOC/gallon of applied coating solids] from any surface coating operation on a large appliance coating line.

Applicable Compliance Method:

Compliance with the kg of VOC/liter of coating solids limitation shall be based upon the recordkeeping requirements in section d)(5). [OAC rule 3745-77-07(C)(1) and PTI 03-17356]

40 CFR Part 63 Subpart NNNN

k. Emission Limitation:

Organic hazardous air pollutants shall not exceed 0.13 kg/liter (1.10 pounds per gallon) of coating solids used during each compliance period

Applicable Compliance Method:

Emission rate without add-on control option: Compliance shall be demonstrated in accordance with 63.4151 – Equations 1 and 1A through 1C and, if applicable, 63.4151(e)(4); 63.4151 Equation 2; and 63.4151 Equation 3. [OAC rule 3745-77-07(C)(1), PTI 03-17356, and 40 CFR Part 63 Subpart NNNN]

- (3) Method 24 or formulation data supplied by the coating manufacturer shall be used to determine the VOC content of a coating. In the event of a dispute, Method 24 shall be the reference method. For determining compliance only, results of Method 24 waterborne coatings shall be adjusted as described in Section 12.6 of Method 24. Procedures to determine VOC emissions are provided in 40 CFR 60.453. [OAC rule 3745-77-07(C)(1), PTI 03-17356, and 40 CFR 60.456(a)(1)]

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.