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

4/3/2012

Certified Mail

Facility ID: 1667040015
Permit Number: P0106486
County: Portage

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

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

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

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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Akron Regional Air Quality Management District. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Akron Regional Air Quality Management District

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Title V Permit
for
Schneller LLC

Facility ID:	1667040015
Permit Number:	P0106486
Permit Type:	Renewal
Issued:	4/3/2012
Effective:	4/24/2012
Expiration:	4/24/2017

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Schneller LLC

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Authorization

Facility ID:	1667040015
Facility Description:	Coated Fabrics, Not Rubberized.
Application Number(s):	A0039677, A0041744
Permit Number:	P0106486
Permit Description:	Renewal Title V Permit for four reverse roll coaters with optional in-line rotogravure station (K001, K003, K004, and K007), one quad roll coater with optional in-line rotogravure station (K005), one silk screen printing machine (K006), and a compounding department (P002).
Permit Type:	Renewal
Issue Date:	4/3/2012
Effective Date:	4/24/2012
Expiration Date:	4/24/2017
Superseded Permit Number:	P0102037

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

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

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

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

The above named entity is hereby granted a 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 Akron Regional Air Quality Management District. 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 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 Akron Regional Air Quality Management District.

(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 contaminent 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 RequirementsUnder 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 RequirementsUnder 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 insignificant emissions units are located at this facility:

   B001 - 4.19 MMBtu/hour natural gas fired boiler (Permit to Install (PTI)# 16-1026)

   T004 - 4000 gallon horizontal cylindrical storage tank (PTI# 16-1299)

   T005 - 2000 gallon horizontal cylindrical storage tank (PTI# 16-1299)

   T006 - Tank for Rotary Screen Washer Solvent – Rotary Tank #1

   T007 - Tank for Rotary Screen Washer Solvent – Rotary Tank #2

   Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified PTI for the emissions unit. Insignificant emissions units listed above that are not subject to specific PTI requirements are subject to one or more applicable requirements contained in the federally - approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

   [Authority for term:OAC rule 3745-77-07(A)(13)]

3. Schneller, LLC has requested to restrict the emissions of volatile organic compounds (VOC) to 222.8 tons per year based upon the rolling, 12-month summation of the monthly emission rates.The company proposed this emission limitation to avoid being classified as a major source for Prevention of Significant Deterioration (PSD).Schneller, LLC has accepted this emission limitation as a facility-wide cap on VOC emissions from the following emissions units: K001, K003, K004, K005, K006, K007, and P002.

   [Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(A)(1)]

4. In order to determine compliance with the facility-wide VOC emission limitation, the permittee shall maintain monthly records of the following information for emissions units: K001, K003, K004, K005, K006, K007, and P002.

   a) The permittee shall collect and record the following information each month for each controlled emissions units K001, K003, K004, K005, and K007:

      (1) the name and identification number of each coating employed, as applied;

      (2) the VOC content of each coating employed, in pounds per gallon, as applied;

      (3) the number of gallons of each coating employed;

      (4) the uncontrolled VOC emissions from all the coatings employed, in ton(s) per month for each emissions unit (i.e., the sum of a)(2) times a)(3) for all coatings applied during the month, divided by 2,000 pounds per ton);

(5) the calculated, controlled VOC emission rate for all coatings employed, in ton(s) per month for each emissions unit (i.e., the uncontrolled VOC emission rate, calculated in a)(4) above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance);

(6) the name and identification of each cleanup material employed;

(7) the VOC content of each cleanup material employed, in pounds per gallon, as applied;

(8) the number of gallons of each cleanup material employed;

(9) the VOC emission rate from all cleanup materials employed, in ton(s) per month for each emissions unit (i.e., the sum of a)(7)times a)(8) for each cleanup material,divided by 2000 pounds per ton);

(10) the total VOC emission rate from all coatings and cleanup materials employed for each emissions unit (i.e., a)(5) plus a)(9) for each emissions unit); and

(11) the total VOC emission rate from all coatings and cleanup materials employed for all controlled emissions units (K001, K003, K004, K005, and K007), in ton(s) per month (i.e.,the summation of the VOC emissions from all emissions units in a)(10) above).

b) The permittee shall collect and record the following information each month for emissions unit K006:

(1) the name and identification number of each coating and cleanup material, as applied;

(2) the VOC content of each coating and cleanup material, in pounds per gallon, as applied;

(3) the number of gallons of each coating and cleanup material employed; and

(4) the total VOC emissions from all coatings and cleanup materials, in ton(s) per month (i.e., the sum of b)(2) times b)(3) for each coating plus the sum of b)(2) times b)(3) for each cleanup material, divided by 2000 pounds per ton).

c) The permittee shall collect and record the following information each month for emissions unit P002:

(1) the amount of material mixed, in pounds per month;

(2) the VOC emission rate from the mixing operation, excluding cleanup material, in ton(s) per month (i.e., multiply the emissions factor of 0.00356* pound of VOC per pound of material mixed by c)(1), divided by 2000 pounds per ton);

(3) the name and identification of each cleanup material employed;

(4) the VOC content of each cleanup material, in pounds of VOC per gallon, as applied;

(5) the number of gallons of each cleanup material employed;

(6) the VOC emission rate for all cleanup materials employed, in ton(s) per month (i.e., the sum of c)(4) times c)(5) for each cleanup material, divided by 2000 pounds per ton);

(7) the total VOC emission rate from the mixing operation and all cleanup materials employed, in ton(s) per month (i.e., the sum of c)(2) plus c)(6)).

*The VOC emission factor was developed by the company and described in a document entitled "Quantification of Emissions from Compound Mixing", revised December 16, 2003.

d) The permittee shall collect and record the following information each month for the facility (emissions units K001, K003, K004, K005, K006, K007, and P002):

(1) the VOC emissions from all the materials employed, in ton(s) per month, i.e., [4.a)(11) + 4.b)(4) + 4.c)(7)]; and

(2) theVOC emissions during the rolling 12-month period, i.e., the summation of all VOC emissions, as recorded in d)(1) above, for the present month plus the previous 11 months of operation, in ton(s).

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

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

a) Emission Limitation:

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

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based upon the record keeping requirements established in 4.a), 4.b), 4.c), and 4.d) above.

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

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

C. Emissions Unit Terms and Conditions

1. K005, ROTARY SCREEN

Operations, Property and/or Equipment Description:

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

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The emissions of volatile organic compounds (VOC) shall not exceed 7.83 pounds per hour for coatings and 34.3 tons per year for coatings and cleanup materials. The thermal oxidizer shall achieve a control (destruction) efficiency which is at least 96 percent, by weight, for VOC and the capture equipment shall achieve a capture efficiency which is at least 95 percent, by weight, for VOC. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart KK.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Prevention of Significant Deterioration (PSD) Permitting)	See 3, 4, 5, and 6 of Section B - Facility-Wide Terms and Conditions.
c.	OAC rule 3745-17-07(A)	For the natural gas fired oven, visible particulate emissions (PE) from the stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-10	For the natural gas fired oven, the maximum allowable amount of PE shall be 0.020 pound per million Btu of actual heat input.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-21-07(M)(2)	The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-21-19(D)(2)	The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-21-19(E)	See c)(1) and c)(2) below.
h.	40 CFR Part 60, Subpart FFF	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The temperature sensor is located in the combustion chamber at the exhaust outlet. This sensor location and monitoring, record keeping, and reporting requirements of 40 CFR Part 63, Subpart KK have been deemed to satisfy the monitoring, record keeping, and reporting requirements of 40 CFR Part 60, Subpart FFF.
i.	40 CFR Part 63, Subpart KK	Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 5 percent of the organic HAP applied for the month by operating a capture system and control device and demonstrating an overall organic HAP control efficiency of at least 95 percent for each month.
j.	40 CFR Part 63, Subpart A (40 CFR Part 63.823)	Table 1 to Subpart KK of Part 63 – Applicability of General Provisions to Subpart KK of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
k.	40 CFR Part 64	Pursuant to 40 CFR 64.2(b), the ComplianceAssurance Monitoring (CAM) requirements of 40 CFRPart 64 shall not apply to the MACT emissionlimitations for HAPs of 40 CFR Part 63, Subpart KK specified in this permit. The VOC emission limitations in OAC rule 3745-31-05(A)(3) shall be incompliance with the CAMrequirements of 40 CFR Part 64 by complying withsections 63.828(a)(2)(ii), 63.828(a)(4)(i),

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		63.828(a)(5), 63.829(b)(1) and 63.830(b)(6) of 40 CFR Part 63, Subpart KK.

(2) Additional Terms and Conditions

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

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

c) Operational Restrictions

(1) Flush cleaning operations.

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

[Authority for term: OAC rule 3745-21-19(E)(3) and OAC rule 3745-77-07(C)(1)]

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

a. All fresh and spent cleaning solvents shall be stored in nonabsorbent, nonleaking containers that are kept closed at all times except when filling or emptying.

b. All used solvent-laden cloths and papers, and any other absorbent applicators used for cleaning, shall be placed in nonabsorbent, nonleaking containers or bags that are kept closed at all times except when depositing or removing these materials from the container or bag.

c. The handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents shall be conducted in such a manner that minimizes spills.

[Authority for term: OAC rule 3745-21-19(E)(4) and OAC rule 3745-77-07(C)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

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

(2) The permittee shall install, calibrate, maintain, and operate according to manufacturer's specifications, a temperature monitoring device equipped with a continuous recorder. The temperature monitoring device shall be located in the firebox or in the duct immediately downstream of the firebox in a position before any substantial heat exchange occurs.

[Authority for term: OAC rule 3745-21-19(G) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall install, calibrate, maintain, and operate, according to manufacturer's specifications a pressure monitoring device equipped with a continuous recorder to measure pressure drop across the permanent total enclosure with an accuracy of at least 0.5 inch of water column or five per cent of the measured value, whichever is larger.

[Authority for term: OAC rule 3745-21-19(G) and OAC rule 3745-77-07(C)(1)]

(4) While operating a VOC emission control system for controlling emissions from this emissions unit, the permittee shall not operate any capture or control device within the VOC emission control system at a three-hour block average value less than 1421 degrees Fahrenheit or less than the operating limits (operating parameter values) established during the most recent compliance test(s) that demonstrated compliance, except during periods of startup, shutdown, and malfunction.

[Authority for term: OAC rule 3745-21-19(G) and OAC rule 3745-77-07(C)(1)]

(5) The permittee shall inspect the VOC emission control system and monitoring equipment to assure that the VOC emission control system is operating properly, and that no leaks or malfunctions have occurred or areoccurring. The inspections shall be made at the frequency defined by the equipment manufacturer, or as otherwise appropriate for each VOC emission control system and monitoring equipment, but not less than monthly.

[Authority for term: OAC rule 3745-21-19(G) and OAC rule 3745-77-07(C)(1)]

(6) For any capture system that is part of a VOC emissions control and that contains bypass lines which could divert flow (i.e., VOC emissions) away from the control device to the atmosphere, the permittee shall for each bypass line employ a valve closure monitoring system that ensures any bypass line valve is in the closed (nondiverting) position through monitoring of valve position at least once every fifteen minutes. The permittee shall inspect the monitoring system at least once every month to verify that the monitor will indicate valve position.

[Authority for term: OAC rule 3745-21-19(G) and OAC rule 3745-77-07(C)(1)]

(7) Establish the operating limit as follows:

a. Monitor and record the combustion temperature either in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs at least once every fifteen minutes during each of the three runs of the compliance test.

b. Calculate and record the average combustion temperature maintained during the compliance test. This average combustion temperature is the minimum operating limit for the thermal oxidizer.

[Authority for term: OAC rule 3745-21-19(I)(2) and OAC rule 3745-77-07(A)(1)]

(8) The pressure drop across the permanent total enclosure shall be at least 0.007 inch of water.

[Authority for term: OAC rule 3745-21-19(I)(2) and OAC rule 3745-77-07(A)(1)]

(9) The following types of records are to be maintained by the permittee of an aerospace manufacturing or rework facility subject to OAC rule 3745-21-19:

a. Compliance demonstration records for coating operations.

b. Compliance demonstration records for cleaning operations.

c. Monitoring records for VOC emission control systems.

[Authority for term: OAC rule 3745-21-19(J)(1) and OAC rule 3745-77-07(C)(1)]

(10) The permittee shall maintain the following records:

a. For each coating in use at the facility:

i. The name and VOC content as received and as applied.

ii. The type of coating, as identified in paragraphs (D)(1)(a) and (D)(1)(b) of OAC rule 3745-21-19.

iii. Where applicable, identification of the coating as designated for control pursuant to paragraph (D)(2) of OAC rule 3745-21-19 or exempted pursuant to paragraphs (D)(3)(a) to (D)(3)(e) of OAC rule 3745-21-19.

b. All data, calculations, and test results (including USEPA Method 24 results) used in determining the VOC content of each coating, expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

c. The amount (gallons) of each coating used each month at the facility.

d. For any coating operation controlled by a VOC emission control system:

i. identification of the coating line;

ii. documentation on the overall control efficiency of the VOC emission control system and the control efficiency of the thermal oxidizer within the VOC emission control system, including design estimates and the results of compliance tests conducted pursuant to paragraphs (F)(2), (F)(3), and (I) of OAC rule 3745-21-19; and

iii. for any coating that is controlled by the VOC emission control system, the name of the coating, the dates (or time periods) of control, and the amount (gallons) of such coating controlled each month.

[Authority for term: OAC rule 3745-21-19(J)(2) and OAC rule 3745-77-07(C)(1)]

(11) For any VOC emission control system, the permittee shall maintain monitoring records as follows for the thermal oxidizer:

a. continuous records of the firebox temperature;

b. records of all three-hour block averages of the firebox temperature during operation of the emissions unit;

c. a record of the operating limit established in d)(7) above; and

d. records of the times and durations of all periods during process or control operation when the monitoring device is not working.

[Authority for term: OAC rule 3745-21-19(J)(4) and OAC rule 3745-77-07(C)(1)]

(12) For the capture system bypass line that could divert flow (i.e., VOC emissions) away from the control device to the atmosphere, the permittee shall maintain the monitoring records specified below for the valve closure monitoring system:

a. hourly records of whether the monitoring device was operating and whether a diversion of flow (VOC emissions) to the atmosphere was detected at any time during the hour;

b. a record indicating that a monthly inspection of the monitoring device has been done; and

c. records of the times and durations of all periods when the monitoring device is not operating or flow (VOC emissions) is diverted to the atmosphere.

[Authority for term: OAC rule 3745-21-19(J)(4) and OAC rule 3745-77-07(C)(1)]

(13) For monthly (or more frequent) inspections of the VOC emission control system and monitoring equipment conducted pursuant to d)(5) above, a record of the results of each inspection.

[Authority for term: OAC rule 3745-21-19(J)(4) and OAC rule 3745-77-07(C)(1)]

(14) All records specified in d)(9) through d)(13) above shall be retained by the permittee for a period of not less than five years and shall be made available to the director or any authorized representative of the director for review during normal business hours.

[Authority for term: OAC rule 3745-21-19(J)(1) and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

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

Section:	Requirement:
63.830(b)(6)	semi-annual summary report.

(2) The permittee shall submit semiannual compliance status reports no later than thirty calendar days after the end of each six-month period to the appropriate Ohio environmental protection agency district office or local air agency.The first report shall be submitted no later than thirty calendar days after the end of the first six-month period following the compliance date.Subsequent reports shall be submitted no later than thirty calendar days after the end of each six-monthperiod following the first report or no later than thirty calendar days after the end of each six-month period otherwise established within a permit issued for the aerospace manufacturing or rework facility.For each semiannual compliance status report, the permittee shall submit the following information for the six-month period covered by the report:

a. For any VOC emission control system employed to met paragraph (D)(2) of OAC rule 3745-21-19, any changes to monitoring devices previously reported and required under paragraph (G) of OAC rule 3745-21-19.

b. If any subsequent compliance tests of the VOC emission control system are conducted during the semiannual reporting period after the initial compliance status report has been submitted, the semiannual compliance status report shall include the results of each compliance test, a complete test report, and the

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

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

d. Compliance certification for semiannual reporting period.

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

i. For any coating operation that is equipped with a VOC emission control system to comply with paragraph (D)(2) of OAC rule 3745-21-19:

(a) The compliance certification shall state that the three-hour block averages of the monitoring parameters recorded pursuant to paragraph (K)(5) of OAC rule 3745-21-19 had complied with the operating limits (operating parameter values) for the monitoring parameters established under paragraph (J)(2) of OAC rule 3745-21-19 during of all periods of operation of the coating operation in the semiannual reporting period; or should otherwise identify the times and durations of all periods of noncompliance and the reasons for noncompliance.

(b) The compliance certification shall identify the times and durations of all periods during coating operation or control operation when the monitoring device is not working, as recorded pursuant to paragraph (J)(3) of OAC rule 3745-21-19 and paragraph (K)(5) of rule 3745-21-15 of the Administrative Code.

(c) For any capture system bypass line, the compliance certification shall identify the times and durations of all periods in which the captured VOC emissions were discharged to atmosphere instead of a control device, as recorded pursuant to paragraph (J)(3) of OAC rule 3745-21-19 and paragraph (K)(5)(f) of rule 3745-21-15 of the Administrative Code, and the reasons for the discharges to atmosphere.

(d) The compliance certification shall state that the overall reduction and control of VOC emissions, based on the most recent compliance test conducted in accordance with paragraph (I) of OAC rule 3745-21-19, has met the requirements under paragraph (D)(2) of OAC rule 3745-21-19 for each coating designated for control during the semiannualreporting period, or should otherwise identify the periods of noncompliance and the reasons for noncompliance.

ii. For cleaning operations subject to paragraph (E) of OAC rule 3745-21-19, the compliance certification shall identify for the semiannual reporting period:

(a) Any other instance of noncompliance with a requirement under paragraph (E) of OAC rule 3745-21-19; and

(b) If the cleaning operations have been in compliance for the semiannual reporting period, a statement that the cleaning operations have been in compliance with the applicable requirements.

iii. The compliance certification shall identify and describe any corrective actions considered and implemented for any noncompliance being reported in the compliance certification.

iv. The compliance certification shall be signed by the responsible official of a Title V facility, as defined in OAC rule 3745-77-01 or the signatory authority under OAC rule 3745-31-02 for a facility that is not Title V, that owns or operates the aerospace manufacturing or rework facility.

[Authority for term: OAC rule 3745-21-19(K)(3) and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

i. Monitor an operating parameter established in accordance with 40 CFR Part 63.828(a)(4) to assure control device efficiency, and

ii. For each capture system delivering emissions to that oxidizer, monitor an operating parameter established in accordance with 40 CFR Part 63.828(a)(5) to assure capture efficiency, and

iii. Determine the organic HAP emission for those presses served by each capture system delivering emissions to that oxidizer by:

(a) Determining the oxidizer destruction efficiency (E) using the procedure in 40 CFR 63.827(d);

(b) Determining the capture system efficiency (F) in accordance with 40 CFR Part 63.827(e)-(f); and

(c) Calculating the overall organic HAP control efficiency, (R), using the following equation: $R = \frac{(E)(F)}{100}$.

[Authority for term: sections 63.825(d)(1) and 63.825(f)(3) of 40 CFR Part 63, Subpart KK]

b. Emission Limitation:

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

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

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

Applicable Compliance Method:

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

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

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

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

Applicable Compliance Method:

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

*minimum overall control efficiency

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

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

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

f. Emission Limitations:

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

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

a. The emission testingshall be conductedwithin 6 months prior to the permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the control efficiency limitation for VOC.

c. The permanent total enclosure was verified on May 2, 2006 resulting in the capture efficiency being 100%. As long as no changes to the permanent total enclosure have been made since the initial capture efficiency testing, retesting for the capture efficiency will not be required. If changes are made to the permanent total enclosure, then the capture efficiency shall be reevaluated as specified in d below.

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

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

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

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

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

i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-21-10(C), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

2. K006, SILKSCREEN

Operations, Property and/or Equipment Description:

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

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The emissions of volatile organic compounds (VOC) shall not exceed 15.4 pounds per hour for coatings and 67.5 tons per year for coatings and cleanup materials.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Prevention of Significant Deterioration (PSD) Permitting)	See 3, 4, 5, and 6 of Section B - Facility-Wide Terms and Conditions.
c.	OAC rule 3745-17-07(A)	For the natural gas fired oven, visible particulate emissions (PE) from the stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-10	For the natural gas fired oven, the maximum allowable amount of PE shall be 0.020 pound per million Btu of actual heat input.
e.	OAC rule 3745-21-19(D)(1)	Coatings applied in the coating operation shall not exceed 7.0 pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

(2) Additional Terms and Conditions

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

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The VOC content of a coating shall be determined by the permittee in accordance with paragraph (B) of rule 3745-21-10 of the Administrative Code, wherein formulation data or USEPA Method 24 procedures (which include various ASTM measurement methods) may be employed.

(2) The following types of records are to be maintained by the permittee of an aerospace manufacturing or rework facility subject to OAC rule 3745-21-19:

a. Compliance demonstration records for coating operations.

b. Compliance demonstration records for cleaning operations.

c. Monitoring records for VOC emission control systems.

[Authority for term: OAC rule 3745-21-19(J)(1) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall maintain the following records:

a. For each coating in use at the facility:

i. The name and VOC content as received and as applied.

ii. The type of coating, as identified in paragraphs (D)(1)(a) and (D)(1)(b) of OAC rule 3745-21-19.

iii. Where applicable, identification of the coating as designated for control pursuant to paragraph (D)(2) of OAC rule 3745-21-19 or exempted pursuant to paragraphs (D)(3)(a) to (D)(3)(e) of OAC rule 3745-21-19.

b. All data, calculations, and test results (including USEPA Method 24 results) used in determining the VOC content of each coating, expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

c. The amount (gallons) of each coating used each month at the facility.

[Authority for term: OAC rule 3745-21-19(J)(2) and OAC rule 3745-77-07(C)(1)]

(4) All records specified in d)(2) and d)(3) above shall be retained by the permittee for a period of not less than five years and shall be made available to the director or any authorized representative of the director for review during normal business hours.

[Authority for term: OAC rule 3745-21-19(J)(1) and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit semiannual compliance status reports no later than thirty calendar days after the end of each six-month period to the appropriate Ohio environmental protection agency district office or local air agency.The first report shall be submitted no later than thirty calendar days after the end of the first six-monthperiod following the compliance date.Subsequent reports shall be submitted no later than thirty calendar days after the end of each six-monthperiod following the first report or no later than thirty calendar days after the end of each six-month period otherwise established within a permit issued for the aerospace manufacturing or rework facility.For each semiannual compliance status report, the permittee shall submit the following information for the six-month period covered by the report:

a. For any coating operation subject to paragraph (D)(1) of OAC rule 3745-21-19, the permittee shall state in the semiannual compliance status report any changes to the previous reporting of the types of coatings and the VOC content limits for the coatings.

b. Compliance certification for semiannual reporting period.

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

i. For any coating that is subject to a VOC content limit of paragraph (D)(1) of OAC rule 3745-21-19, the compliance certification shall state that only coatings which comply with the applicable VOC content limit have been used each operating day in the semiannual reporting period, or should otherwise identify the periods of use of coatings that did not comply, the reasons for such use of noncompliant coatings, and the amounts and VOC contents of each such noncompliant coating used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.

ii. The compliance certification shall identify and describe any corrective actions considered and implemented for any noncompliance being reported in the compliance certification.

iii. The compliance certification shall be signed by the responsible official of a Title V facility, as defined in OAC rule 3745-77-01 or the signatory authority under OAC rule 3745-31-02 for a facility that is not Title V, that owns or operates the aerospace manufacturing or rework facility.

[Authority for term: OAC rule 3745-21-19(K)(3) and OAC rule 3745-77-07(C)(1)].

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

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

Applicable Compliance Method:

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

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

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

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

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

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

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

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

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

3. P002, COMPOUND DEPT.

Operations, Property and/or Equipment Description:

8 mixers for the blending of pigments into raw compounds for subsequent coating and printing operations (See g)(1) below.)

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)	For CMD Cowles Mixer #2 and CDM Cowles Mixer #4: The emissions of volatile organic compounds (VOC) for each mixer shall not exceed 4.16 pounds per hour and 18.22 tons per year. For CMD Plastisol Mixer #2: The emissions of VOC shall not exceed 0.28 pound per hour and 1.23 tons per year. For the Coating Dept. Mixer: The emissions of VOC shall not exceed 7.39 pounds per hour and 32.37 tons per year. See b)(2)a. below.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Prevention of Significant Deterioration (PSD) Permitting)	See 3, 4, 5, and 6 of Section B - Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. The hourly and annual VOC emission limitations are based on each mixer's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None

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:

For CMD Cowles Mixer #2 and CDM Cowles Mixer #4: The emissions of VOC for each mixer shall not exceed 4.16 pounds per hour and 18.22 tons per year.

For CMD Plastisol Mixer #2: The emissions of VOC shall not exceed 0.28 pound per hour and 1.23 tons per year.

For the Coating Dept. Mixer: The emissions of VOC shall not exceed 7.39 pounds per hour and 32.37 tons per year.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitations for the CMD Cowls Mixer #2 and #4 and CMD Plastisol Mixer #2 above shall be demonstrated by multiplying the VOC emission factor of 0.003562 pound of VOC per pound of material mixed* by the maximum amount of material mixed, in pounds per hour.

Compliance with the hourly allowable VOC emission limitation for the Coating Dept. Mixer above shall be demonstrated by multiplying the VOC emission factor of 0.00211 pound of VOC per pound of material mixed* by the maximum amount of material mixed, in pounds per hour.

The annual allowable VOC emission limitations above were determined by multiplying the hourly allowable VOC emission limitations by 8760 hours per year, and then dividing by 2000. Therefore, as long as compliance with the hourly allowable emission limitations is maintained, compliance with the annual allowable emission limitations shall be assumed.

*The VOC emission factor was developed by the company and described in a document entitled "Quantification of Emissions from Compound Mixing", revised December 16, 2003.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) Table 1. Compound Room Mixers

Mixer Identification	Manufacturer	Installation Date	Capacity in pounds per hour
CMD Cowles #1	Myers	Prior to 1974	1167
CMD Cowles #2	Cowles	1989	1167
CMD Cowles #3	Cowles	Prior to 1974	1167
CMD Cowles #4	Cowles	2005	1167
CMD Bench Ink #1	Delta	Prior to 1974	15
CMD Bench Ink #2	Rockwell/Delta	Prior to 1974	15
CMD Plastisol #1	Custom Built	1998	80
Coating Dept. Mixer	Cowles	2006	3500

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

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

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	For emissions unit K001: The emissions of volatile organic compounds (VOC) shall not exceed 20.3 pounds per hour for coatings and 88.9 tons per year for coatings and cleanup materials. The capture equipment for emissions unit K001 shall achieve a capture efficiency which is at least 98.2 percent, by weight, for VOC. For emissions unit K003: The emissions of VOC shall not exceed 16.25 pounds per hour for coatings and 71.2 tons per year for coatings and cleanup materials. The capture equipment for emissions unit K003 shall achieve a capture efficiency which is at least 92.2 percent, by weight, for VOC. For emissions unit K004: The emissions of VOC shall not exceed 24.53 pounds

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		per hour for coatings and 107.4 tons per year for coatings and cleanup materials. The capture equipment for emissions unit K004 shall achieve a capture efficiency which is at least 98.5 percent, by weight, for VOC. For emissions unit K001, K003, and K004, the thermal oxidizer shall achieve a control (destruction) efficiency which is at least 96 percent, by weight, for VOC. For emissions unit K007: The emissions of VOC shall not exceed 2.5 pounds per hour for coatings and 11.0 tons per year for coatings and cleanup materials. For emissions unit K007, the thermal oxidizer and capture equipment shall achieve an overall control efficiency of at least 95 percent, by weight, for VOC. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart KK.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Prevention of Significant Deterioration (PSD) Permitting)	See 3, 4, 5, and 6 of Section B - Facility-Wide Terms and Conditions.
c.	OAC rule 3745-21-19(D)(2)	The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 60, Subpart FFF	For emissions units K003, K004, and K007, the emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The temperature sensor is located in the combustion chamber at the exhaust outlet. This sensor location and monitoring, record keeping, and reporting requirements of 40 CFR Part 63, Subpart KK have been deemed to satisfy the monitoring, record keeping, and reporting requirements of 40 CFR Part 60, Subpart

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		FFF.
e.	40 CFR Part 63, Subpart KK	Organic hazardous air pollutant (HAP) emissions shall be limited to no more than 5 percent of the organic HAP applied for the month by operating a capture system and control device and demonstrating an overall organic HAP control efficiency of at least 95 percent for each month.
f.	40 CFR Part 63, Subpart A (40 CFR Part 63.823)	Table 1 to Subpart KK of Part 63 – Applicability of General Provisions to Subpart KK of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
g.	40 CFR Part 64	Pursuant to 40 CFR 64.2(b), the ComplianceAssurance Monitoring (CAM) requirements of 40 CFRPart 64 shall not apply to the MACT emissionlimitations for HAPs of 40 CFR Part 63, Subpart KK specified in this permit. The VOC emission limitations in OAC rule 3745-31-05(A)(3) shall be incompliance with the CAMrequirements of 40 CFR Part 64 by complying withsections 63.828(a)(2)(ii), 63.828(a)(4)(i), 63.828(a)(5), 63.829(b)(1) and 63.830(b)(6) of 40 CFR Part 63, Subpart KK.

(2) Additional Terms and Conditions

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

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

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

(2) The permittee shall install, calibrate, maintain, and operate according to manufacturer's specifications, a temperature monitoring device equipped with a continuous recorder. The temperature monitoring device shall be located in the firebox or in the duct immediately downstream of the firebox in a position before any substantial heat exchange occurs.

[Authority for term: OAC rule 3745-21-19(G) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall install, calibrate, maintain, and operate, according to manufacturer's specifications a pressure monitoring device equipped with a continuous recorder to measure pressure drop across the permanent total enclosure with an accuracy of at least 0.5 inch of water column or five per cent of the measured value, whichever is larger.

[Authority for term: OAC rule 3745-21-19(G) and OAC rule 3745-77-07(C)(1)]

(4) While operating a VOC emission control system for controlling emissions from emissions units K003 and K004, the permittee shall not operate any capture or control device within the VOC emission control system at a three-hour block average value less than 1421 degrees Fahrenheit or less than the operating limits (operating parameter values) established during the most recent compliance test(s) that demonstrated compliance, except during periods of startup, shutdown, and malfunction.

[Authority for term: OAC rule 3745-21-19(G) and OAC rule 3745-77-07(C)(1)]

(5) While operating a VOC emission control system for controlling emissions from emissions units K001 and K007, the permittee shall not operate any capture or control device within the VOC emission control system at a three-hour block average value less than 1401 degrees Fahrenheit or less than the operating limits (operating parameter values) established during the most recent compliance test(s) that demonstrated compliance, except during periods of startup, shutdown, and malfunction.

[Authority for term: OAC rule 3745-21-19(G) and OAC rule 3745-77-07(C)(1)]

(6) The permittee shall inspect the VOC emission control system and monitoring equipment to assure that the VOC emission control system is operating properly, and that no leaks or malfunctions have occurred or areoccurring. The inspections shall be made at the frequency defined by the equipment manufacturer, or as otherwise appropriate for each VOC emission control system and monitoring equipment, but not less than monthly.

[Authority for term: OAC rule 3745-21-19(G) and OAC rule 3745-77-07(C)(1)]

(7) For any capture system that is part of a VOC emissions control and that contains bypass lines which could divert flow (i.e., VOC emissions) away from the control device to the atmosphere, the permittee shall for each bypass line employ a valve closure monitoring system that ensures any bypass line valve is in the closed (nondiverting) position through monitoring of valve position at least once every fifteen minutes. The permittee shall inspect the monitoring system at least once every month to verify that the monitor will indicate valve position.

[Authority for term: OAC rule 3745-21-19(G) and OAC rule 3745-77-07(C)(1)]

(8) Establish the operating limit as follows:

a. Monitor and record the combustion temperature either in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs at least once every fifteen minutes during each of the three runs of the compliance test.

b. Calculate and record the average combustion temperature maintained during the compliance test. This average combustion temperature is the minimum operating limit for the thermal oxidizer.

[Authority for term: OAC rule 3745-21-19(I)(2) and OAC rule 3745-77-07(A)(1)]

(9) The pressure drop across the permanent total enclosure shall be at least 0.007 inch of water.

[Authority for term: OAC rule 3745-21-19(I)(2) and OAC rule 3745-77-07(A)(1)]

(10) The following types of records are to be maintained by the permittee of an aerospace manufacturing or rework facility subject to OAC rule 3745-21-19:

a. Compliance demonstration records for coating operations.

b. Compliance demonstration records for cleaning operations.

c. Monitoring records for VOC emission control systems.

[Authority for term: OAC rule 3745-21-19(J)(1) and OAC rule 3745-77-07(C)(1)]

(11) The permittee shall maintain the following records:

a. For each coating in use at the facility:

i. The name and VOC content as received and as applied.

ii. The type of coating, as identified in paragraphs (D)(1)(a) and (D)(1)(b) of OAC rule 3745-21-19.

iii. Where applicable, identification of the coating as designated for control pursuant to paragraph (D)(2) of OAC rule 3745-21-19 or exempted pursuant to paragraphs (D)(3)(a) to (D)(3)(e) of OAC rule 3745-21-19.

b. All data, calculations, and test results (including USEPA Method 24 results) used in determining the VOC content of each coating, expressed in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied.

c. The amount (gallons) of each coating used each month at the facility.

d. For any coating operation controlled by a VOC emission control system:

i. identification of the coating line;

ii. documentation on the overall control efficiency of the VOC emission control system and the control efficiency of the thermal oxidizer within the VOC emission control system, including design estimates and the results of compliance tests conducted pursuant to paragraphs (F)(2), (F)(3), and (I) of OAC rule 3745-21-19; and

iii. for any coating that is controlled by the VOC emission control system, the name of the coating, the dates (or time periods) of control, and the amount (gallons) of such coating controlled each month.

[Authority for term: OAC rule 3745-21-19(J)(2) and OAC rule 3745-77-07(C)(1)]

(12) For any VOC emission control system, the permittee shall maintain monitoring records as follows for the thermal oxidizer:

a. continuous records of the firebox temperature;

b. records of all three-hour block averages of the firebox temperature during operation of any of the emissions units listed above;

c. a record of the operating limit established in d)(8) above; and

d. records of the times and durations of all periods during process or control operation when the monitoring device is not working.

[Authority for term: OAC rule 3745-21-19(J)(4) and OAC rule 3745-77-07(C)(1)]

(13) For the capture system bypass line that could divert flow (i.e., VOC emissions) away from the control device to the atmosphere, the permittee shall maintain the monitoring records specified below for the valve closure monitoring system:

a. hourly records of whether the monitoring device was operating and whether a diversion of flow (VOC emissions) to the atmosphere was detected at any time during the hour;

b. a record indicating that a monthly inspection of the monitoring device has been done; and

c. records of the times and durations of all periods when the monitoring device is not operating or flow (VOC emissions) is diverted to the atmosphere.

[Authority for term: OAC rule 3745-21-19(J)(4) and OAC rule 3745-77-07(C)(1)]

(14) For monthly (or more frequent) inspections of the VOC emission control system and monitoring equipment conducted pursuant to d)(6) above, a record of the results of each inspection.

[Authority for term: OAC rule 3745-21-19(J)(4) and OAC rule 3745-77-07(C)(1)]

(15) All records specified in d)(10) through d)(14) above shall be retained by the permittee for a period of not less than five years and shall be made available to the director or any authorized representative of the director for review during normal business hours.

[Authority for term: OAC rule 3745-21-19(J)(1) and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

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

Section:	Requirement:
63.830(b)(6)	semi-annual summary report

(2) The permittee shall submit semiannual compliance status reports no later than thirty calendar days after the end of each six-month period to the appropriate Ohio environmental protection agency district office or local air agency.The first report shall be submitted no later than thirty calendar days after the end of the first six-month period following the compliance date.Subsequent reports shall be submitted no later than thirty calendar days after the end of each six-monthperiod following the first report or no later than thirty calendar days after the end of each six-month period otherwise established within a permit issued for the aerospace manufacturing or rework facility.For each semiannual compliance status report, the permittee shall submit the following information for the six-month period covered by the report:

a. For any VOC emission control system employed to met paragraph (D)(2) of OAC rule 3745-21-19, any changes to monitoring devices previously reported and required under paragraph (G) of OAC rule 3745-21-19.

b. If any subsequent compliance tests of the VOC emission control system are conducted during the semiannual reporting period after the initial compliance status report has been submitted, the semiannual compliance status report shall include the results of each compliance test, a complete test report, and the compliance test monitoring data as described under paragraphs (K)(2)(c)(iii) to (K)(2)(c)(v) of OAC rule 3745-21-19.

c. Compliance certification for semiannual reporting period.

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

i. For any coating operation that is equipped with a VOC emission control system to comply with paragraph (D)(2) of OAC rule 3745-21-19:

(a) The compliance certification shall state that the three-hour block averages of the monitoring parameters recorded pursuant to paragraph (K)(5) of OAC rule 3745-21-19 had complied with the operating limits (operating parameter values) for the monitoring parameters established under paragraph (J)(2) of OAC rule 3745-21-19 during of all periods of operation of the coating operation in the semiannual reporting period; or should otherwise identify the times and durations of all periods of noncompliance and the reasons for noncompliance.

(b) The compliance certification shall identify the times and durations of all periods during coating operation or control operation when the monitoring device is not working, as recorded pursuant to paragraph (J)(3) of OAC rule 3745-21-19 and paragraph (K)(5) of rule 3745-21-15 of the Administrative Code.

(c) For any capture system bypass line, the compliance certification shall identify the times and durations of all periods in which the captured VOC emissions were discharged to atmosphere instead of a control device, as recorded pursuant to paragraph (J)(3) of OAC rule 3745-21-19 and paragraph (K)(5)(f) of rule 3745-21-15 of the Administrative Code, and the reasons for the discharges to atmosphere.

(d) The compliance certification shall state that the overall reduction and control of VOC emissions, based on the most recent compliance test conducted in accordance with paragraph (I) of OAC rule 3745-21-19, has met the requirements under paragraph (D)(2) of OAC rule 3745-21-19 for each coating designated for control during the semiannual reporting period, or should otherwise identify the periods of noncompliance and the reasons for noncompliance.

ii. The compliance certification shall identify and describe any corrective actions considered and implemented for any noncompliance being reported in the compliance certification.

iii. The compliance certification shall be signed by the responsible official of a Title V facility, as defined in OAC rule 3745-77-01 or the signatory authority under OAC rule 3745-31-02 for a facility that is not Title V, that owns or operates the aerospace manufacturing or rework facility.

[Authority for term: OAC rule 3745-21-19(K)(3) and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

i. Monitor an operating parameter established in accordance with 40 CFR Part 63.828(a)(4) to assure control device efficiency, and

ii. For each capture system delivering emissions to that oxidizer, monitor an operating parameter established in accordance with 40 CFR Part 63.828(a)(5) to assure capture efficiency, and

iii. Determine the organic HAP emission for those presses served by each capture system delivering emissions to that oxidizer by:

(a) Determining the oxidizer destruction efficiency (E) using the procedure in 40 CFR 63.827(d);

(b) Determining the capture system efficiency (F) in accordance with 40 CFR Part 63.827(e)-(f); and

(c) Calculating the overall organic HAP control efficiency, (R), using the following equation: $\mathrm{R} = \frac{(\mathrm{E})(\mathrm{F})}{100}$.

[Authority for term: section 63.825(d)(1) of 40 CFR Part 63, Subpart KK]

b. Emission Limitations:

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

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

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

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

Applicable Compliance Method:

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

*minimum overall control efficiency

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

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

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

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

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

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitations:

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

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

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

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

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

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)(1)]

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

a. The emission testingshall be conductedwithin 6 months prior to the permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the control efficiency limitation for VOC.

c. The permanent total enclosures for emissions units K001, K003, K004, and K007 were verified on May 3, 2006, March 16, 2011, May 2, 2006, and May 3, 2006, respectively, resulting in the capture efficiency being 100%. As long as no changes to the permanent total enclosure have been made since the initial capture efficiency testing, retesting for the capture efficiency will not be required. If changes are made to the permanent total enclosure, then the capture efficiency shall be reevaluated as specified in d below.

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

e. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the

diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

f. The test(s) shall be conducted while the emissions unitsare operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

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

i. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-21-10(C), OAC rule 3745-31-05(A)(3), and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.