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

4/5/2012

Certified Mail

Facility ID: 0278060360
Permit Number: P0107990
County: Trumbull

Christopher Page
Cleveland Steel Container Corp.
412 Mason St.
Niles, OH 44446

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 Ohio EPA DAPC, Northeast District Office. 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*
Ohio EPA DAPC, Northeast District Office

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Title V Permit
for
Cleveland Steel Container Corp.

Facility ID:	0278060360
Permit Number:	P0107990
Permit Type:	Renewal
Issued:	4/5/2012
Effective:	4/26/2012
Expiration:	4/26/2017

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Cleveland Steel Container Corp.

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Authorization

Facility ID: 0278060360
Facility Description:
Application Number(s): A0041442
Permit Number: P0107990
Permit Description: Renewal Title V permit for Steel Pail Manufacturer- eight coating processes, two controlled by catalytic & thermal incinerators
Permit Type: Renewal
Issue Date: 4/5/2012
Effective Date: 4/26/2012
Expiration Date: 4/26/2017
Superseded Permit Number: P0086170

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

Cleveland Steel Container Corp.
412 Mason Street
Niles, OH 44446

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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

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

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

c) The permittee shall submit required reports in the following manner:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

3. Scheduled Maintenance

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

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

4. Risk Management Plans

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

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

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

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the

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

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; orthe 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 ; ora 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 permittee shall maintain, service, repair, or dispose of equipment containing any class I or class II substance used as refrigerant in such equipment pursuant to the applicable provisions of 40 CFR Part 82.

   (Authority for term: 40 CFR Part 82)

3. All asbestos renovation and demolition activities conducted at this facility shall be performed in accordance with the applicable requirements specified in 40 CFR Part 61 and OAC Chapter 3745-20.

   (Authority for term: 40 CFR Part 61 and OAC Chapter 3745-20)

4. The Ohio EPA has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions unit K005. The permittee shall comply with the provisions of the plan (as specified in Part C - Emissions Unit Terms and Conditions) during any operation of the aforementioned emissions unit.

   (Authority for term: 40 CFR Part 64)

5. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products: K004, K005, K006 and K007. The complete MACT requirements including the MACT General Provisions may be access via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Ohio EPA Northeast District office.

   The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart MMMM. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 1 of 40 CFR Part 63, Subpart MMMM. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart MMMM and Subpart A.

   (Authority for term: 40 CFR Part 63, Subpart MMMM)

6. The following insignificant emissions unit is located at this facility:

   K010: UV Litho Line.

   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 permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install 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)]

C. Emissions Unit Terms and Conditions

1. K002, 7 Gallon Litho Line

Operations, Property and/or Equipment Description:

Steel sheet printing line with a 3 mmBtu/hr natural gas-fired bake-off oven.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-2473)	Volatile organic compound (VOC) emissions shall not exceed 4.6 tons/year
b.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)a.
c.	40 CFR Part 63, Subpart MMMM	Exempt. See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee shall not employ more than 10 gallons of coatings per day in this emissions unit to coat metal parts.

b. This line applies only non-HAP coating materials. If the coating materials in this line exceed the organic HAP limits defined in 63.3981, this emissions unit will become subject to the requirements of 40 CFR Part 63, Subpart MMMM.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the company identification for each coating and clean up material employed;

b. the VOC content of each coating and clean up material, in lbs/gallon;

c. the number of gallons of each coating and clean up material employed; and

d. the total VOC emissions from all coatings and clean up materials, in lbs/day (sum of b x c).

(Authority for term: OAC rules 3745-21-09(B)(3)(d) and 3745-77-07(C)(1) and PTI 02-2473)

(2) The permittee shall maintain annual records of the total VOC emissions for this emissions unit.

(Authority for term: OAC rules 3745-21-09(B)(3)(d) and 3745-77-07(C)(1) and PTI 02-2473)

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA Northeast District Office of any daily record showing that the coating line employs more than 10 gallons/day. A copy of such record shall be sent to the Ohio EPA Northeast District Office within 45 days after the exceedance occurs.

(Authority for term: OAC rules 3745-21-09(B)(3)(e) and 3745-77-07(C)(1))

(2) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

(Authority for term: PTI 02-2473 and OAC rule 3745-77-07(C)(1))

f) Testing Requirements

(1) Compliance with the emissions limitations specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:

VOC emissions shall not exceed 4.6 tons/year

<u>Applicable Compliance Method</u>:

Compliance with this emission limitation shall be demonstrated based upon the record keeping and reporting requirements specified in d) and e).

(Authority for term: PTI 02-2473 and OAC rule 3745-77-07(C)(1))

b. <u>Emission Limitation</u>:

The permittee shall not employ more than 10 gallons of coatings per day in this emissions unit to coat metal parts.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated based upon the record keeping and reporting requirements specified in d) and e).

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

(2) If required, U.S. EPA Method 24 or formulation data shall be used to determine the VOC/HAP content of each coating and clean up material used in this emissions unit.

g) Miscellaneous Requirements

(1) None.

2. K003, 5 Gallon Litho Line

Operations, Property and/or Equipment Description:

Steel sheet printing line with a 2.5 mmBtu/hr natural gas-fired bake-off oven

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-987)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii).
b.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)a.
c.	40 CFR Part 63, Subpart MMMM	Exempt. See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee shall not employ more than 10 gallons of coatings per day in this emissions unit to coat metal parts.

b. This line applies only non-HAP coating materials. If the coating materials in this line exceed the organic HAP limits defined in 63.3981, this emissions unit will become subject to the requirements of 40 CFR Part 63, Subpart MMMM.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the company identification for each coating and clean up material employed;

b. the number of gallons of each coating and clean up material employed; and

c. the total number of gallons of all coatings and clean up materials employed.

(Authority for term: OAC rules 3745-21-09(B)(3)(d) and 3745-77-07(C)(1))

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA Northeast District Office of any daily record showing that the coating line employs more than 10 gallons/day. A copy of such record shall be sent to the Ohio EPA Northeast District Office within 45 days after the exceedance occurs.

(Authority for term: OAC rules 3745-21-09(B)(3)(e) and 3745-77-07(C)(1))

f) Testing Requirements

(1) Compliance with the emissions limitations specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The permittee shall not employ more than 10 gallons of coatings per day in this emissions unit to coat metal parts.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated based upon the record keeping and reporting requirements specified in d) and e).

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

g) Miscellaneous Requirements

(1) None.

3. K004, Sheet Coating Line

Operations, Property and/or Equipment Description:

Sheet roll coater with a 2.5 mmBtu/hr natural gas-fired oven controlled by a catalytic incinerator

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-2351)	VOC emissions shall not exceed 40 tons/year The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(B)(6).
b.	OAC rule 3745-21-09(B)(6)	See b)(2)b.
c.	40 CFR Part 63, Subpart MMMM (40 CFR 63.3880-63.3981)	Organic HAP emissions shall be limited to no more than 2.6 lbs/gal (0.31 kg/L) coating solids used during each 12-month compliance period. See b)(2)a.
d.	40 CFR 63.1-63.15 (40 CFR 63.3901)	Table 2 -- Applicability of General Provisions to Subpart MMMM of Part 63 specifies which sections of the General Provisions in 40 CFR 63.1-63.15 apply.

(2) Additional Terms and Conditions

a. The permittee shall comply with all applicable provisions required under 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3890(b)(1)	Existing general use coating affected source
63.3892(b)	Operating limits for controlled coating operations
63.3900(a)(2) and 63.6(f)(1)-(2)	Continuous compliance with all emission and operating limits

b. In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee shall comply with the provisions of OAC rule 3745-21-09(B)(6) and shall operate and maintain a catalytic incinerator and emission capture system capable of capturing and controlling VOC emissions from emissions unit K004.

The VOC capture and control equipment shall provide not less than an 81% reduction, by weight, in the overall VOC emissions from emissions unit K004, and the control equipment shall provide an efficiency (percent destruction) of not less than 90%, by weight, for VOC emissions vented to the catalytic incinerator.

c) Operational Restrictions

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

63.3900(b)	Operation and maintenance requirements
63.3893(b)	Work practice plan to minimize organic HAP emissions
63.3891(c), 63.3892(b) and Table 1	Emission rate with add-on controls, catalytic incinerator and permanent total enclosure (PTE)
63.3900(c)	Startup, shutdown, and malfunction plan

(1) The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of the catalyst, as determined in an annual catalyst activity test (see section d(5)), shall be sufficient to meet the control device removal efficiency requirements of this permit at a test temperature that is equal to that temperature at which the inlet to the catalyst bed is set. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

(Authority for term: 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 under 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3968(a) & (c), and 63.8(c)(1)-(3)	Install and maintain a continuous parameter monitoring system (CPMS)
63.10(b)&(c)	Startup, shutdown, malfunction
63.3968(b)	Bypass lines
63.3968(g)	Capture system operation and maintenance
63.3930(a)	Copies of notifications and reports
63.3930(b)	Material supplier and manufacturer information
63.3930(c)(4), 63.3961	Calculations
63.3930(d)	Material identification
63.3930(e)-(g), 63.3961(e)-(h), and (k)-(n)	Material usage, percent HAP, density

63.3930(h), 63.3951(e)(4)	Waste treatment, storage and disposal
63.3930(j)-(k), 63.3963	Deviations and continuous compliance
63.3930(k)(6)-(7)	Data, calculations, capture and control efficiency determinations
63.3930(k)(8)	Work practice plan
63.3931	Record retention

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting the Ohio EPA Northeast District Office. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

(2) The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

a. The name and identification number of each coating and clean up material;

b. The VOC content of each coating and clean up material, as applied, in lbs/gal;

c. The number of gallons of each coating and clean up material employed;

d. The total uncontrolled VOC emissions from all coatings and clean up materials employed, in pounds or tons; and

e. The calculated, controlled VOC emission rate for all coatings and cleanup materials, in pounds or tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

(Authority for term: PTI No. 02-2351 and OAC rule 3745-77-07(C)(1))

(3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit(s) controlled by the catalytic incinerator is/are in operation, shall not be more than 50° F below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. The acceptable average temperature difference across the catalyst bed, for any 3-hour block of time (when the emissions unit(s) is/are in operation), shall not be less than 80% of the average temperature difference measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

(Authority for term: OAC rule 3745-21-09(B)(3)(l)(iii))

(4) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be

guaranteed by the manufacturer to be within ± 1% of the temperature being measured or ± 5° F, whichever is greater. The temperature monitors and recorder(s) shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50° F below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

b. all 3-hour blocks of time, when the emissions unit(s) controlled by the catalytic incinerator was/were in operation, during which the average temperature difference across the catalyst bed was less than 80% of the average temperature difference measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

c. a log or record of the operating time for the capture (collection) system, catalytic incinerator, monitoring equipment, and the associated emissions unit(s).

The permittee may use a temperature chart recorder or equivalent recording device as the log that documents the temperature differential across the catalyst bed. These records shall be maintained at the facility for a period of no less than 3 years.

(Authority for term: 40 CFR Part 63, Subpart MMMM and OAC rule 3745-21-09(B)(3)(l)(iii))

(5) The permittee shall perform a preventative maintenance inspection of the catalytic incinerator on an annual basis to evaluate the performance of the catalyst bed. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, and shall include a physical inspection of the unit and all of the associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment and the catalyst shall be performed as determined by the inspection. During each annual inspection a sample of the catalyst material shall be collected from the catalyst bed and used to perform a catalyst activity test. The permittee shall maintain a record of the results of each annual inspection and the results of each annual catalyst activity test.The permittee is exempt from the requirement to test the catalyst material each calendar year when emission testing for this control device is conducted with passing results. However, annual inspections are required each year.

The permittee shall also perform weekly inspections of the external integrity of the catalytic incinerator. Records shall be maintained of the inspections and the date(s) of catalyst replacement, and if only partial, the amount or percent of the total catalyst replaced.

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

(6) Whenever the monitored average temperature of the exhaust gases immediately before the catalyst bed and/or the average temperature difference across the catalyst bed deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s)/limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the temperature of the exhaust gases immediately before the catalyst and the average temperature difference across the catalyst bed immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

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

The temperature ranges are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted temperature range(s) based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) of the controlled pollutant(s). In addition, approved revisions to the temperature range(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

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

e) Reporting Requirements

(1) The permittee shall submit the following reports to the Ohio EPA Northeast District Office, as required by 40 CFR Part 63, Subpart MMMM within the time periods specified in each section:

63.3920(a)(1)-(4)	Semi-annual compliance reports
63.3920(a)(7)	Deviation reports
63.3920(b), 63.7(g)	Performance test reports
63.3920(c), 63.6(e)(3)	Startup, shutdown, malfunction reports
63.3920(c)(2), 63.10(d)(5)(ii)	Immediate startup, shutdown, malfunction reports
63.3930(h), and 63.3951(e)(4)	Waste treatment, storage and disposal

(2) The permittee shall submit quarterly summaries of the following records:

a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50° F below the average temperature established during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

b. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average temperature difference across the catalyst bed was less than 80% of the average temperature difference established during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

c. any records of downtime (date and length of time) for the capture (collection) system, the catalytic incinerator, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and

d. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the catalytic incinerator;

e. a log of the operating time for the capture system, catalytic incinerator, monitoring equipment, and the emissions unit(s).

f. each incident of deviation described in “a - d” (above) where a prompt investigation was not conducted;

g. each incident of deviation described in “a - d” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed into compliance with the acceptable range(s), was determined to be necessary and was not taken; and

h. each incident of deviation described in “a - d” where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

The permittee shall submit the results of the catalyst activity test(s) in the last quarterly report for each year, along with a summary of the results of the annual inspection of the internal integrity of the catalytic incinerator.

(Authority for term: OAC rules 3745-21-09(B)(3)(m) and 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:

VOC emissions shall not exceed 40 tons/year

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by the record keeping and reporting specified in sections d) and e).

(Authority for term: PTI No. 02-2351 and OAC rule 3745-77-07(C)(1))

b. Emission Limitation:

The VOC capture and control equipment shall provide not less than an 81% reduction, by weight, in the overall VOC emissions from emissions unit K004, and the control equipment shall provide an efficiency (percent destruction) of not less than 90%, by weight, for VOC emissions vented to the catalytic incinerator.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing procedures specified in f)(4).

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

(2) Formulation data or US EPA Method 24 shall be used to determine the VOC content of the coatings and clean up materials.

(Authority for term: OAC rules 3745-21-04(B)(5) and 3745-77-07(C)(1))

(3) The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in this permit. An intent to test notification shall not be required for catalyst activity testing. The procedures for the catalyst activity test shall be conducted in accordance with the manufacturer's recommendations and as required by the appropriate test method.

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

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

a. Emission testing is scheduled for February, 2012. Subsequent testing shall be conductedevery 2.5 years.

b. The emission testing shall be conducted to demonstrate compliance with the overall reduction and destruction efficiency of the catalytic incinerator.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Methods 1- 4 and Method 25 or 25A of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The capture efficiency is assumed to be 100%.Testing is scheduled for January, 2012 to ensure the following conditions are met:

i. the capture system meets the criteria in Method 204 found in 40 CFR Part 51, Appendix M for a permanent total enclosure and all the exhaust gases from the enclosure are directed to the catalytic incinerator.

ii. all coatings, thinners and or other additives, and cleaning materials used in the coating operation are applied within the capture system; coating solvent flash-off, curing, and drying occurs within the capture system; and the removal or evaporation of cleaning materials from the surfaces they are applied to occurs within the capture system.

[Authority for term: 40 CFR 63.3965]

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 3745-21-10 or an alternative test protocol approved by the Ohio EPA. 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 total gaseous organic emissions mass flow rate, in lbs/hr, shall be calculated according to the procedures outlined in 40 CFR 63.3966(d), 63.3967 and 63.7(b)(1).

g. For each test run, the catalytic incinerator's organic emissions destruction efficiency shall be calculated according to the procedures outlined in 40 CFR 63.3966(e), 63.3967 and 63.7(b)(1).

h. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Ohio EPA Northeast District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

i. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

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

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

(Authority for term(s): 40 CFR 63.3966, 63.3967, 63.7(b)(1), OAC rules 3745-15-04(A), 3745-21-10(A), 3745-21-10(C) and 3745-77-07(C)(1))

g) Miscellaneous Requirements

(1) None.

4. K005, Small Container Paint Line

Operations, Property and/or Equipment Description:

Airless exterior/interior pail coating line with a 2.5 mmBtu/hr natural gas-fired bake oven controlled by a regenerative thermal oxidizer

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(B)(6)	See b)(2)a.
b.	40 CFR Part 63, Subpart MMMM (40 CFR 63.3880-63.3981)	Organic HAP emissions shall be limited to no more than 2.6 lbs/gal (0.31 kg/L) coating solids used during each 12-month compliance period. See b)(2)b.
c.	40 CFR 63.1-63.15 (40 CFR 63.3901)	Table 2 -- Applicability of General Provisions to Subpart MMMM of Part 63 specifies which sections of the General Provisions in 40 CFR 63.1-63.15 apply.
d.	40 CFR Part 64 CAM	See b)(2)c.

(2) Additional Terms and Conditions

a. In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee shall comply with the provisions of OAC rule 3745-21-09(B)(6) and shall operate and maintain a thermal oxidizer and emission capture system capable of capturing and controlling VOC emissions from emissions unit K005.

The VOC capture and control equipment shall provide not less than an 81% reduction, by weight, in the overall VOC emissions from emissions unit K005, and the control equipment shall provide an efficiency (percent destruction) of not less than 90%, by weight, for VOC emissions vented to the thermal oxidizer.

b. The permittee shall comply with all applicable provisions required under 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3890(b)(1)	Existing general use coating affected source
63.3892(b)	Operating limits for controlled coating operations
63.3900(a)(2), and 63.6(f)(1)-(2)	Continuous compliance with all emission and operating limits

c. Pursuant to 40 CFR 64.2(b), the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 will not apply to the MACT emission limitations for HAPs of 40 CFR Part 63, Subpart MMMM specified in this permit after the compliance date for this existing affected source (January 2, 2007) if the permittee elects to comply with the MACT emission limitations for HAPs by using a capture system and add-on control equipment to meet the "Emission Rate with Add-on Controls" option (40 CFR 63.3891(c)).

The CAM requirements of 40 CFR Part 64 will continue to apply to the monitoring for the VOC capture and control efficiency requirements of OAC rule 3745-21-09(B)(6) after the compliance date for this existing affected source (January 2, 2007).

c) Operational Restrictions

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

63.3900(b)	Operation and maintenance requirements
63.3893(b)	Work practice plan to minimize organic HAP emissions
63.3891(c), 63.3892(b) and Table 1	Emission rate with add-on controls, thermal oxidizer and permanent total enclosure (PTE)
63.3900(c)	Startup, shutdown, and malfunction plan

(2) The duct static pressure or gas volumetric flow rate shall be maintained within the range established during the most recent emission test that demonstrated the emissions unit was in compliance at all times when the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

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

63.3968(a) & (c), and 63.8(c)(1)-(3)	Install and maintain a continuous parameter monitoring system (CPMS)
63.10(b)&(c)	Startup, shutdown, malfunction
63.3968(b)	Bypass lines
63.3968(g)	Capture system operation and maintenance
63.3930(a)	Copies of notifications and reports
63.3930(b)	Material supplier and manufacturer information
63.3930(c)(4), 63.3961	Calculations
63.3930(d)	Material identification

63.3930(e)-(g), 63.3961(e)-(h), and (k)-(n)	Material usage, percent HAP, density
63.3930(h), 63.3951(e)(4)	Waste treatment, storage and disposal
63.3930(j)-(k), 63.3963	Deviations and continuous compliance
63.3930(k)(6)-(7)	Data, calculations, capture and control efficiency determinations
63.3930(k)(8)	Work practice plan
63.3931	Record retention

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting the Ohio EPA Northeast District Office. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

(2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50° F below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance.

(Authority for term: OAC rules 3745-21-09(B)(3)(l)(ii) & 40 CFR 64)

(3) The CAM plan for monitoring the control efficiency of the thermal oxidizer controlling VOC emissions from this emissions unit has been developed for the monitoring of the combustion temperature within the thermal oxidizer. The CAM performance indicator, and indicator range, for this temperature requirement is specified in d)(1). When the temperature is outside of the indicator range, corrective action (including, but not limited to, an evaluation of the thermal oxidizer) will be required.

Upon detecting an excursion of the thermal oxidizer's temperature indicator range the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(4) The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the duct static pressure or gas volumetric flow rate to the thermal oxidizer. The CAM performance indicator, and indicator range, for duct static pressure or gas volumetric flow rate is specified in d)(1). When the duct static pressure or gas volumetric flow rate is outside of the indicator

range, corrective action (including, but not limited to, an evaluation of the thermal oxidizer) will be required.

Upon detecting an excursion of the duct static pressure or gas volumetric flow rate range, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

Pursuant to 40 CFR 64.3(a)(2), the permittee shall monitor the performance of the emission capture system using one of the following procedures:

a. Install, calibrate, maintain and operate a pressure measuring device to monitor the duct static pressure at the inlet plenum to the thermal oxidizer; or

b. Install, calibrate, maintain and operate a flow measuring device to monitor the gas volumetric flow rate in the duct between the capture device and the thermal oxidizer.

The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s), with any modifications deemed necessary by the permittee. The permittee shall record the duct static pressure or gas volumetric flow rate on a daily basis.

The "Emission Capture System" requirements specified in 40 CFR 63.3967(f) will satisfy the Capture System Monitoring requirements of 40 CFR Part 64.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(5) Pursuant to 40 CFR 64.3(a)(2), the permittee shall monitor each bypass damper (or valve) located in the exhaust gas capture system between the emissions unit and the air pollution control device and each emergency bypass valve installed at the air pollution control device that allows the exhaust gas to be diverted away from the air pollution control device to atmosphere using one of the following procedures:

a. Install, calibrate, maintain and operate a flow control position indicator that provides a record indicating whether the exhaust stream was directed to the control device or was diverted from the control device. The time and control position shall be recorded at least once per hour, as well as every time the flow direction is changed.

b. Ensure that any bypass line valve or damper is in the closed position through continuous monitoring of valve position. The monitoring system shall be inspected at least once every month to ensure that it is functioning properly.

c. Use an automatic shutdown system in which the emissions unit is idled and operations are ceased when flow is diverted away from the control device to any bypass line. The automatic system shall be inspected at least once every month to ensure proper functioning.

d. Secure a bypass line valve in the closed position with a car-seal or a lock-and-key type configuration; a visible inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve or damper is maintained in the closed position and the exhaust stream is not diverted through the bypass line. Each bypass damper or valve shall be inspected at least annually to ensure proper operation of the valve or damper.

The "Capture System Bypass Line" requirements specified in 40 CFR 63.3968(b) will satisfy the Bypass Indication Monitoring requirements of 40 CFR Part 64.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(6) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(7) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1% of the temperature being measured or ± 5° F, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50° F below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.

(Authority for term: OAC rules 3745-21-09(B)(3)(l)(ii), 40 CFR 63 Subpart MMMM & 40 CFR 64)

(8) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the temperature readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

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

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(A)(1) & 40 CFR 64)

e) Reporting Requirements

(1) The permittee shall submit the following reports to the Ohio EPA Northeast District Office, as required by 40 CFR Part 63, Subpart MMMM within the time periods specified in each section:

63.3920(a)(1)-(4)	Semi-annual compliance reports
63.3920(a)(7)	Deviation reports
63.3920(b), 63.7(g)	Performance test reports
63.3920(c), 63.6(e)(3)	Startup, shutdown, malfunction reports
63.3920(c)(2), 63.10(d)(5)(ii)	Immediate startup, shutdown, malfunction reports
63.3930(h), and 63.3951(e)(4)	Waste treatment, storage and disposal

(2) The permittee shall submit quarterly summaries of the following records:

a. all deviations of the duct static pressure or gas volumetric flow rate range;

b. all excursions (i.e., findings that the bypass monitoring procedure has not been followed, the bypass monitoring system is not operable, or that a required bypass damper or monitoring system inspection has not been conducted) of the bypass indication monitoring;

c. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50° F below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

d. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation;

e. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;

f. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s);

g. each incident of deviation described in “c-e” (above) where a prompt investigation was not conducted;

h. each incident of deviation described in “c-e” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and

i. each incident of deviation described in “c-e” where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

(Authority for term: OAC rules 3745-21-09(B)(3)(m), 3745-77-07(C)(1), and 40 CFR Part 64))

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:

The VOC capture and control equipment shall provide not less than an 81% reduction, by weight, in the overall VOC emissions from emissions unit K005, and the control equipment shall provide an efficiency (percent destruction) of not less than 90%, by weight, for VOC emissions vented to the thermal oxidizer.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing procedures specified in f)(4).

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

(2) Formulation data or US EPA Method 24 shall be used to determine the VOC content of the coatings and clean up materials.

(Authority for term: OAC rules 3745-21-04(B)(5) and 3745-77-07(C)(1))

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

a. Emission testing is scheduled for February, 2012. Subsequent testing shall be conductedevery 2.5 years.

b. The emission testing shall be conducted to demonstrate compliance with the overall reduction and destruction efficiency of the thermal oxidizer.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Methods 1- 4 and Method 25 or 25A of 40 CFR Part 6, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The capture efficiency is assumed to be 100%. Testing is scheduled for February, 2012 to ensure the following conditions are met:

i. the capture system meets the criteria in Method 204 found in 40 CFR Part 51, Appendix M for a permanent total enclosure and all the exhaust gases from the enclosure are directed to the thermal oxidizer.

ii. all coatings, thinners and or other additives, and cleaning materials used in the coating operation are applied within the capture system; coating solvent flash-off, curing, and drying occurs within the capture system; and the removal or evaporation of cleaning materials from the surfaces they are applied to occurs within the capture system.

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 3745-21-10 or an alternative test protocol approved by the Ohio EPA. 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 total gaseous organic emissions mass flow rate, in lbs/hr, shall be calculated according to the procedures outlined in 40 CFR 63.3966(d) 63.3967, and 63.7(b)(1).

g. For each test run, the thermal oxidizer's organic emissions destruction efficiency shall be calculated according to the procedures outlined in 40 CFR 63.3966(e) 63.3967, and 63.7(b)(1).

h. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the Ohio EPA Northeast District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

i. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

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

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

(Authority for term(s): 40 CFR 63.3966, 63.3967, 63.7(b)(1), OAC rules 3745-15-04(A), 3745-21-10(A), 3745-21-10(C) and 3745-77-07(C)(1))

g) Miscellaneous Requirements

(1) None.

5. K006, Flange Spray Booth

Operations, Property and/or Equipment Description:

Flange paint booth: airless spray booth, parts are air dried

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 3745-21-09(U)(2)(e)(iii)	See b)(2)a.
b.	40 CFR Part 63, Subpart MMMM (40 CFR 63.3880-63.3981)	Organic HAP emissions shall be limited to no more than 2.6 lbs/gal (0.31 kg/L) coating solids used during each 12-month compliance period. See b)(2)b.
c.	40 CFR 63.1-63.15 (40 CFR 63.3901)	Table 2 -- Applicability of General Provisions to Subpart MMMM of Part 63 specifies which sections of the General Provisions in 40 CFR 63.1-63.15 apply.

(2) Additional Terms and Conditions

a. The permittee shall not employ more than 10 gallons of coatings per day in this emissions unit to coat metal parts.

b. The permittee shall comply with all applicable provisions required under 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3890(b)(1)	Existing general use coating affected source
63.3892(a) and 63.3893(a)	Operating limits and work practice standards
63.3900(a)(1) and (b), and 63.3952	Continuous compliance with all emission limits, operation and maintenance requirements.

c) Operational Restrictions

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

63.3900(b)	Operation and maintenance requirements
63.3892(a), and 63.3893(a)	Operating limits and work practice plans

d) Monitoring and/or Recordkeeping Requirements

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

a. the company identification for each coating and clean up material employed;

b. the number of gallons of each coating and clean up material employed; and

c. the total number of gallons of all coatings and clean up materials employed.

(Authority for term: OAC rules 3745-21-09(B)(3)(d) and 3745-77-07(C)(1))

(2) The permittee shall collect and record the following information in accordance with all applicable requirements under 40 CFR Part 63, Subpart MMMM:

63.3930(a)	Copies of notifications and reports
63.3930(b)	Material supplier and manufacturer information
63.3930(c)(3), and 63.3951	Calculations
63.3930(d)	Material Identification
63.3930(e)-(g), and 63.3951(a)-(h)	Material usage, density, mass and volume
63.3930(h) and 63.3951(e)(4)	Waste treatment, storage and disposal
63.3930(j), 63.3952(a)-(d)	Deviations and continuous compliance records
63.3931(a)-(c)	Records retention

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting the Ohio EPA Northeast District Office. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA Northeast District Office of any daily record showing that the coating line employs more than 10 gallons/day. A copy of such record shall be sent to the Ohio EPA Northeast District Office within 45 days after the exceedance occurs.

(Authority for term: OAC rules 3745-21-09(B)(3)(e) and 3745-77-07(C)(1))

(2) The permittee shall submit the following reports to the Ohio EPA Northeast District Office, as required by 40 CFR Part 63, Subpart MMMM within the time periods specified in each section:

63.3920(a)(1)-(4)	Semi-annual compliance reports
63.3920(a)(6)	Deviation reports
63.3930(h), and 63.3951(e)(4)	Waste treatment, storage and disposal

f) Testing Requirements

(1) Compliance with the emissions limitations specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The permittee shall not employ more than 10 gallons of coatings per day in this emissions unit to coat metal parts.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated based upon the record keeping and reporting requirements specified in d) and e).

b. Emission Limitation:

Organic HAP emissions shall be limited to no more than 2.6 lbs/gal (0.31 kg/L) coating solids used during each 12-month compliance period.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated based upon the record keeping and reporting requirements specified in d) and e).

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

g) Miscellaneous Requirements

(1) None.

6. K007, Bottom Spray Booth

Operations, Property and/or Equipment Description:

Bottom paint spray booth

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 3745-21-09(U)(2)(e)(iii)	See b)(2)a.
b.	40 CFR Part 63, Subpart MMMM (40 CFR 63.3880-63.3981)	Organic HAP emissions shall be limited to no more than 2.6 lbs/gal (0.31 kg/L) coating solids used during each 12-month compliance period. See b)(2)b.
c.	40 CFR 63.1-63.15 (40 CFR 63.3901)	Table 2 -- Applicability of General Provisions to Subpart MMMM of Part 63 specifies which sections of the General Provisions in 40 CFR 63.1-63.15 apply.

(2) Additional Terms and Conditions

a. The permittee shall not employ more than 10 gallons of coatings per day in this emissions unit to coat metal parts.

b. The permittee shall comply with all applicable provisions required under 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3890(b)(1)	Existing general use coating affected source
63.3892(a) and 63.3893(a)	Operating limits and work practice standards
63.3900(a)(1) and (b)	Continuous compliance with all emission limits, operation and maintenance requirements.

c) Operational Restrictions

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

63.3900(b)	Operation and maintenance requirements
63.3892(a), and 63.3893(a)	Operating limits and work practice plans

d) Monitoring and/or Recordkeeping Requirements

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

a. the company identification for each coating and clean up material employed;

b. the number of gallons of each coating and clean up material employed; and

c. the total number of gallons of all coatings and clean up materials employed.

(Authority for term: OAC rules 3745-21-09(B)(3)(d) and 3745-77-07(C)(1))

(2) The permittee shall collect and record the following information in accordance with all applicable requirements under 40 CFR Part 63, Subpart MMMM:

63.3930(a)	Copies of notifications and reports
63.3930(b)	Material supplier and manufacturer information
63.3930(c)(3), and 63.3951	Calculations
63.3930(d)	Material Identification
63.3930(e)-(g), and 63.3951(a)-(h)	Material usage, density, mass and volume
63.3930(h) and 63.3951(e)(4)	Waste treatment, storage and disposal
63.3930(j), 63.3952(a)-(d)	Deviations and continuous compliance records
63.3931(a)-(c)	Records retention

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting the Ohio EPA Northeast District Office. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

e) Reporting Requirements

(1) The permittee shall notify the Ohio EPA Northeast District Office of any daily record showing that the coating line employs more than 10 gallons/day. A copy of such record shall be sent to the Ohio EPA Northeast District Office within 45 days after the exceedance occurs.

(Authority for term: OAC rules 3745-21-09(B)(3)(e) and 3745-77-07(C)(1))

(2) The permittee shall submit the following reports to the Ohio EPA Northeast District Office, as required by 40 CFR Part 63, Subpart MMMM within the time periods specified in each section:

63.3920(a)(1)-(4)	Semi-annual compliance reports
63.3920(a)(6)	Deviation reports
63.3930(h), and 63.3951(e)(4)	Waste treatment, storage and disposal

f) Testing Requirements

(1) Compliance with the emissions limitations specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The permittee shall not employ more than 10 gallons of coatings per day in this emissions unit to coat metal parts.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated based upon the record keeping and reporting requirements specified in d) and e).

b. Emission Limitation:

Organic HAP emissions shall be limited to no more than 2.6 lbs/gal (0.31 kg/L) coating solids used during each 12-month compliance period.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated based upon the record keeping and reporting requirements specified in d) and e).

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

g) Miscellaneous Requirements

(1) None.