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

5/14/2012

Certified Mail

Facility ID: 0250110100
Permit Number: P0108774
County: Mahoning

David McCleery
Spectrum Metal Finishing, Inc.
535 Bev Road
Youngstown, OH 44512-6490

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
Spectrum Metal Finishing, Inc.

Facility ID:	0250110100
Permit Number:	P0108774
Permit Type:	Renewal
Issued:	5/14/2012
Effective:	6/4/2012
Expiration:	6/4/2017

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Spectrum Metal Finishing, Inc.

Table of Contents

Authorization 1
A. Standard Terms and Conditions 2
1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Scheduled Maintenance 6
4. Risk Management Plans 6
5. Title IV Provisions 7
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 8
11. Reopening for Cause 9
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 11
15. Operational Flexibility 11
16. Emergencies 11
17. Off-Permit Changes 11
18. Compliance Method Requirements 12
19. Insignificant Activities or Emissions Levels 12
20. Permit to Install Requirement 12
21. Air Pollution Nuisance 13
22. Permanent Shutdown of an Emissions Unit 13
23. Title VI Provisions 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 14
25. Records Retention Requirements Under State Law Only 14
26. Inspections and Information Requests 14
27. Scheduled Maintenance/Malfunction Reporting 15
28. Permit Transfers 15

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 15

B. Facility-Wide Terms and Conditions 16

C. Emissions Unit Terms and Conditions 18

1. K002, Liquid Coating Line 19

Authorization

Facility ID: 0250110100
Facility Description: coated metal extrusions
Application Number(s): A0042032
Permit Number: P0108774
Permit Description: Renewal of Title V permit for a miscellaneous metal parts coating line controlled by a regenerative thermal oxidizer.
Permit Type: Renewal
Issue Date: 5/14/2012
Effective Date: 6/4/2012
Expiration Date: 6/4/2017
Superseded Permit Number:

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

Spectrum Metal Finishing, Inc.
535 Bev Road
Youngstown, OH 44512-6490

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.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 following insignificant emissions units are located at this facility:

N001	Hook burn-off oven with afterburner
P001	Pretreatment of aluminum extrusions
P002	Pretreatment of aluminum extrusions prior to liquid coating line
P003	Powder coating booth

   Each insignificant emissions unit at this facility must comply with all State and Federal regulations, as well as any emission limitations and/or control requirements contained with 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)(1)]

3. Pursuant to 40 CFR Part 64, the permittee has submitted and the Ohio EPA has approved a compliance assurance monitoring (CAM) plan for emissions unit K002 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions unit.

   [Authority for term: 40 CFR Part 64]

4. The following emissions unit contained in this permit is subject to 40 CFR Part 63, Subpart MMMM: K002. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://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]

C. Emissions Unit Terms and Conditions

1. K002, Liquid Coating Line

Operations, Property and/or Equipment Description:

Liquid coating line consisting of the following: 2 automatic electrostatic primer booths, 2 manual electrostatic topcoat booths, 2 automatic electrostatic topcoat booths, 2 automatic electrostatic clearcoat booths, and a 5 mmBtu/hr 2-zone bake 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), as effective 11/30/01	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 3.65 lbs/hr and 15.99 tons per year, including coating and cleanup. Particulate Emissions (PE) from this emissions unit shall not exceed 3.65 pounds per hour and 15.99 tons per year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). See b)(2)a, b)(2)d, b)(2)e, b)(2)h, b)(2)i, and b)(2)j.
b.	OAC rule 3745-31-05(E), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-21-09(B)(6)	The requirements established pursuant to this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).

d.	OAC rule 3745-17-11(B)(1)	The requirements established pursuant to this rule are less stringent than the requirements of OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(C)	See b)(2)c.
f.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
g.	40 CFR Part 63, Subpart MMMM	The organic hazardous air pollutant (HAP) emissions from the existing general use coatings operations shall not exceed: 0.31 kg/liter of coating solids used during each rolling, 12-month period; or 2.6 lbs/gal of coating solids used during each rolling, 12-month period. The organic HAP emissions from the existing high performance coatings operations shall not exceed: 3.3 kg/liter of coating solids used during each rolling, 12-month period; or 27.5 lbs/gal of coating solids used during each rolling, 12-month period. See b)(2)f and b)(2)g.
h.	40 CFR Part 63, Subpart A (63.1 through 63.15)	Table 2 to Subpart MMMM of 40 CFR Part 63 – Applicability of General Provisions to Subpart MMMM shows which parts of the General Provisions in 40 CFR Part 63.1 through 63.15 apply.
i.	40 CFR Part 64, Compliance Assurance Monitoring (CAM)	See b)(2)k, c)(1), d)(1), d)(9), d)(14), d)(15), d)(16), d)(17), d)(18).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule

revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

[OAC rule 3745-31-05(A)(3), as effective 11/30/01]

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

Permit to Install P0108774 for this air contaminant source takes into account the following voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. Use of adry filtration system for the control of particulate emissions, with a control efficiency of 95%.

ii. The VOC capture and control equipment shall provide not less than a 98% reduction, by weight, in overall VOC emissions from line K002, and the control equipment (thermal incinerator) shall provide an efficiency (percent destruction) of not less than 98%, by weight, for VOC emissions vented to the control equipment.

[OAC rule 3745-31-05(E), as effective 12/01/06]

c. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

d. 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 3745-31-05(A)(3) and shall operate and maintain a thermal incinerator capable of capturing and controlling VOC emissions from line K002.

The VOC capture and control equipment shall provide not less than an 98% reduction, by weight, in overall VOC emissions from line K002, and the control equipment (thermal incinerator) shall provide an efficiency (percent destruction) of not less than 98%, by weight, for VOC emissions vented to the control equipment.

e. All of the VOC emissions from this emissions unit shall be vented to a thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

f. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart MMMM.

The final rules found in 40 CFR Part 63, Subpart MMMM establish national emission standards for HAPs, work practice standards, operating limitations, and compliance requirements for miscellaneous metal parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of miscellaneous metal parts and products:

i. all coating operations as defined in 40 CFR 63.3981;

ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and

iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

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

63.3890(c)(1)	Predominant activity requirements
63.3890(c)(2)	Facility-specific emission limit requirements
63.3891(a)	Compliant material option
63.3891(b)	Emission rate without add-on controls option
63.3891(c)	Emission rate with add-on controls option
63.3892(a)	When using compliant material option or emission rate without add-on controls option, operating limits are not applicable
63.3892(b)	When using emission rate with add-on controls option, the operating limits established in Table 1 and during the performance test apply
63.3892(c)	Approval of alternative monitoring or operating limit

h. A permanent total enclosure shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device, such that all VOC emissions are captured, contained and directed to the control device.

i. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

i. Any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point. An equivalent diameter is the diameter of a circle that has the same area as the opening. If the opening is not circular the equivalent diameter (ED) is calculated as follows:

$$ED = (4\ area/\pi)^{0.5}$$

ii. The total area of all natural draft openings (A_N) shall not exceed 5 percent of the total surface area of the enclosure (A_T), i.e, the four walls, floor, and ceiling. The natural draft opening to enclosure area ratio (NEAR) is calculated as follows:

$$NEAR = A_N / A_T$$

iii. The direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) and a pressure drop of 0.013 mm Hg (0.007 in. H2O).

iv. All access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination described above, shall be completely closed to any air movement during process operations.

v. All VOC emissions shall be captured and contained for discharge through the control device.

j. The permanent total enclosure serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR Part 51, Appendix M, Reference Method 204, and shall capture all of

the VOC emissions from this emissions unit. All coatings, thinners and/or other additives, and cleaning materials used in the coating operation shall be applied within the capture system; coating solvent flash-off, curing, and drying shall occur within the capture system; and the removal or evaporation of cleaning materials from the surfaces they are applied to shall occur within the capture system.

k. 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) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature in the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) in any 3-hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance, and as recommended by the manufacturer until testing.

[Authority for term: PTI P0108773, OAC rule 3745-77-07(C)(1), and 40 CFR Part 64]

(2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for term: PTI P0108773, OAC rule 3745-17-11(C)(1) and (2)(b), and OAC rule 3745-77-07(C)(1)]

(3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for term: PTI P0108773 and OAC rule 3745-17-11(C)(2)(e)]

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

63.3893(a)	When using compliant material option or emission rate without add-on controls option, work practice standards are not applicable
63.3893(b)	When using emission rate with add-on controls option, develop and implement a work practice plan as specified in (b)(1) through (b)(5).
63.3900(a)(1)	When using compliant material option or emission rate without add-on controls option, coating operation must be in compliance at all times
63.3900(a)(2)	When using emission rate with add-on controls option, exception for periods of startup, shutdown and malfunction
63.3900(b)	Operate according to 63.6(e)(1)(i).
63.3900(c)	If using emission capture system and add-on control device, a written startup, shutdown, and malfunction plan is required
63.3950	Compliance date for emission rate without add-on controls option
63.3960(a), (b), (c)	Compliance dates for emission rate with add-on controls option
63.3963(g)	Startup, shutdown, malfunction plan must be followed
63.3967(a)	Establishing operating limits for thermal oxidizers
63.3967(f)	Establishing operating limits for emission capture systems

[Authority for term: 40 CFR Part 63, Subpart MMMM]

(5) The permanent total enclosure shall be maintained under negative pressure, with an average facial velocity at each natural draft opening of 200 feet per minute (3,600 m/hr) or greater, whenever the emissions unit is in operation.

[Authority for term: PTI P0108773, 40 CFR 51, Appendix M, Method 204 and OAC rule 3745-77-07(C)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) 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 percent of the temperature being measured or ± 5 degrees Fahrenheit, 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 acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance. Following compliance testing, 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 was in operation, during which the average combustion temperature within the thermal oxidizer was less than the average combustion temperature maintained during the performance test that demonstrated compliance, or below the temperature recommended by the manufacturer until performance testing is completed; 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: PTI P0108773, OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

(2) The permittee shall collect and record the following information on a daily basis for each coating and cleanup material applied in this emissions unit:

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

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

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

d. the overall control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance;

e. the daily controlled VOC emissions from all coatings applied, in pounds (i.e., the summation of the products of "b" times "c" times "d");

f. the name and identification of each cleanup material, as applied;

g. the VOC content (excluding water and exempt solvents) of each cleanup material, in pounds per gallon;

h. the number of gallons (excluding water and exempt solvents) of each cleanup material, as applied;

i. the total controlled VOC emissions from all cleanup materials, as applied, in pounds (i.e., the summation of the products of "g" times "h" times "d");

j. the total VOC emissions from all coatings and cleanup materials, as applied, in pounds (i.e., the summation of “e” and “i”);

k. the total number of hours this emissions unit was in operation; and

l. the average hourly controlled VOC emissions from all coatings and cleanup materials, as applied, in pounds (i.e., the quotient of “j” divided by “k”).

[Authority for term: PTI P0108773 and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

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

[Authority for term: PTI P0108773 and OAC rule 3745-77-07(C)(1)]

(4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.

[Authority for term: PTI P0108773, OAC rule 3745-17-11(C)(2)(a) and OAC rule 3745-77-07(C)(1)]

(5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer’s recommendations,

instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA Northeast District Office upon request.

[Authority for term: PTI P0108773, OAC rule 3745-17-11(C)(2)(c) and OAC rule 3745-77-07(C)(1)]

(6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term: PTI P0108773, OAC rule 3745-17-11(C)(2)(c) and OAC rule 3745-77-07(C)(1)]

(7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

[Authority for term: PTI P0108773, OAC rule 3745-17-11(C)(2)(d) and (f) and OAC rule 3745-77-07(C)(1)]

(8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA Northeast District Office upon request.

[Authority for term: PTI P0108773, OAC rule 3745-17-11(C)(2)(e),(f) and (g) and OAC rule 3745-77-07(C)(1)]

(9) 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: PTI P0108773, OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

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

63.3930(a)	Keep a copy of each notification and report submitted
63.3930(b)	Keep a current copy of information from materials suppliers or manufacturers
63.3930(c)(1)	Records of compliance options used for each compliance period
63.3930(d), (e), (f), (g), (h), (j)	Required overall records that should be maintained
63.3931(a), (b), (c)	Form and duration of record maintenance

[Authority for term: 40 CFR Part 63, Subpart MMMM]

(11) For the emission rate without add-on controls option, the permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3930(c)(3)	Records of HAP calculations
63.3951(a)	Determine the mass fraction of organic HAP for each material
63.3951(b)	Determine the volume fraction of coating solids
63.3951(c)	Determine the density of each material
63.3951(d)	Determine the volume of each material used
63.3951(e)	Calculate the mass of organic HAP emissions
63.3951(f)	Calculate the total volume of coating solids used
63.3951(g)	Calculate the organic HAP emission rate
63.3951(h)	Compliance demonstration
63.3952(a)	Demonstration of continuous compliance
63.3952(d)	Maintain records as specified in 63.3930 and 63.3931

[Authority for term: 40 CFR Part 63, Subpart MMMM]

(12) For the emission rate with add-on controls option, the permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3930(c)(4)	Records of HAP calculations
63.3930(k)	Records related to control device operation
63.3961(b)	Compliance with operating limits
63.3961(c)	Compliance with work practice requirements
63.3961(d)	Compliance with emission limits
63.3961(e)	Determine the mass fraction of organic HAP, density, volume used, and volume fraction of coating solids
63.3961(f)	Calculate the total mass of organic HAP emissions before add-on controls
63.3961(g)	Calculate the organic HAP emission reduction for each controlled coating operation
63.3961(h)	Calculate the organic HAP emission reduction for each controlled coating operation not using liquid-liquid material balance
63.3961(j)	Calculate the organic HAP emission reduction for each controlled coating operation using liquid-liquid material balances
63.3961(k)	Calculate the total volume of coating solids used
63.3961(l)	Calculate the mass of organic HAP emissions for each month
63.3961(m)	Calculate the organic HAP emission rate for the compliance period
63.3961(n)	Compliance demonstration
63.3963(a)	Continuous compliance demonstration

63.3963(j)	Maintain records as specified in 63.3930 and 63.3931
63.3968(a)	General requirements for continuous parameter monitoring systems
63.3968(b)	Capture system bypass line monitoring requirements
63.3968(c)	Thermal oxidizer monitoring requirements
63.3968(g)	Emission capture systems monitoring requirements

[Authority for term: 40 CFR Part 63, Subpart MMMM]

(13) The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):

a. the measured diameter of each natural draft opening;

b. the distance measured from each natural draft opening to each VOC emitting point;

c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor and ceiling;

d. the calculation or demonstration that the distance from each VOC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and

e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor and ceiling.

[Authority for term: PTI P0108773, 40 CFR 51, Appendix M, Method 204 and OAC rule 3745-77-07(C)(1)]

(14) The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitor and record the air flow velocity at each opening into the permanent total enclosure when the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

a. all 3-hour blocks of time during which the average facial velocity at each opening is not maintained at 200 feet per minute (3,600 m/hr) or greater, as a 3-hour average; and

b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.

[Authority for term: PTI P0108773, 40 CFR 51, Appendix M, Method 204, OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

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

Upon detecting an excursion of the thermal incinerator's temperature indicator range listed in c)(1), 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]

(16) The CAM plan for monitoring the capture efficiency of the control equipment for this emissions unit has been developed for the monitoring of the average facial velocity at each natural draft opening. of 200 feet per minute (3,600 m/hr) or greater. The CAM performance indicator, and indicator range, for average facial velocity at each natural draft opening is 200 feet per minute (3,600 m/hr) or greater as specified in c)(5). When the average facial velocity at each natural draft opening is outside of the indicator range, corrective action (including, but not limited to, an evaluation of the thermal incinerator) will be required.

Upon detecting an excursion of the average facial velocity at each natural draft opening, 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]

(17) 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 every 15 minutes, 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 monitoring of valve position at least once every 15 minutes. 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.

e. Install, calibrate, maintain and operate a flow direction indicator that provides a record indicating whether the exhaust stream was directed to the control device or was diverted from the control device. The reading shall be recorded at least once every 15 minutes. Each time the flow direction changes, the next reading of the time of occurrence and flow direction must be recorded.

[Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63 Section 63.3968(b) and 40 CFR Part 64]

(18) 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]

e) Reporting Requirements

(1) The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and

shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the event occurs.

[Authority for term: PTI P0108773, OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

b. 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;

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

d. each incident of deviation described in “a” or “b” 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;

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

f. an identification of each day where the average hourly VOC emission rate exceeded 3.65 pounds of VOC per hour;

g. 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;

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

i. all 3-hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum air velocity of 200 fpm (3,600 m/hr); and

j. 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 in d)(17).

[Authority for term: PTI P0108773, OAC rule 3745-21-09(B)(3)(l)(ii), OAC rule 3745-77-07(C)(1), , and 40 CFR Part 64]

(3) 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 quarter.

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

[Authority for term: PTI P0108773, OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(m)]

(4) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: PTI P0108773 and OAC rule 3745-77-07(C)(1)]

(5) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The 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 P0108773 and OAC rule 3745-77-07(C)(1)]

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

63.3910(a)	Submit the notifications in 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply
63.3910(b)	Initial notification
63.3910(c)	Notification of compliance status
63.3920(a)	Semiannual compliance reports
63.3920(b)	Performance test reports
63.3920(c)	Startup, shutdown, malfunction reports
63.3952(b)	For emission rate without add-on controls option, deviations from emission limitations must be reported
63.3952(c)	For emission rate without add-on controls option, semiannual compliance report requirements
63.3963(b), (c)	Deviations from emission limitations must be reported

63.3963(d)	Bypass line deviation reporting
63.3963(e)	Work practice standard deviation reporting
63.3963(f)	Semiannual compliance report requirements

[Authority for term: 40 CFR Part 63, Subpart MMMM]

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 from this emissions unit shall not exceed 3.65 lbs/hr, including coating and cleanup.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2)l.

[Authority for term: PTI P0108773 and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

VOC emissions from this emissions unit shall not exceed 15.99 tons per year, including coating and cleanup.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable VOC emission limitation (3.65 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: PTI P0108773 and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

PE from this emissions unit shall not exceed 3.65 pounds per hour.

Applicable Compliance Method:

To determine the worst case hourly particulate emission rate, the following equation may be used:

E = maximum coating solids usage (in pounds per hour) x (1 - TE) x (1 - CE)

where:

E = particulate emissions rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.60); and

CE = fractional control efficiency of the control equipment (0.95).

If required, compliance shall be demonstrated based upon performing emission tests in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

[Authority for term: PTI P0108773, OAC rule 3745-17-03(B)(10) and OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

PE from this emissions unit shall not exceed 15.99 tons per year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (3.65 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

[Authority for term: PTI P0108773 and OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: PTI P0108773, OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

f. Emission Limitation:

The VOC capture and control equipment shall provide not less than an 98% reduction, by weight, in overall VOC emissions from line K002, and the control equipment (thermal incinerator) shall provide an efficiency (percent destruction)

of not less than 98%, by weight, for VOC emissions vented to the control equipment.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in f)(3).

[Authority for term: PTI P0108773 and OAC rule 3745-77-07(C)(1)]

g. Emission Limitations:

The organic HAP emissions from the existing general use coatings operations shall not exceed 0.31 kg/liter of coating solids used during each rolling, 12-month period or 2.6 lbs/gal of coating solids used during each rolling, 12-month period.

The organic HAP emissions from the existing high performance coatings operations shall not exceed 3.3 kg/liter of coating solids used during each rolling, 12-month period or 27.5 lbs/gal of coating solids used during each rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in d)(11) and d)(12).

[Authority for term: PTI P0108773, 40 CFR Part 63, Subpart MMMM and OAC rule 3745-77-07(C)(1)]

(2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the owner or operator shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

[Authority for term: PTI P0108773, OAC rule 3745-21-04(B)(5) and OAC rule 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. The emission testing shall be conducted on a 2.5 year interval with the next required test no later than June 30, 2013.

b. The emission testing shall be conducted in order to determine the VOC mass emission rate, demonstrate compliance with the 100% capture efficiency requirement for the permanent total enclosure, and determine the destruction efficiency of the thermal oxidizer, in percent.

c. The following test methods shall be employed to demonstrate compliance with the allowable VOC mass emission rate, the capture efficiency of the emission capture system vented to the thermal oxidizer and the destruction efficiency of the thermal oxidizer:

Method 1 or 1A of Appendix A to 40 CFR Part 60, as appropriate, to select sampling sites and velocity traverse points;

Method 2, 2A, 2C, 2D, 2F or 2G of Appendix A to 40 CFR Part 60, as appropriate, to measure gas volumetric flow rate;

Method 3, 3A, or 3B of Appendix A to 40 CFR Part 60, as appropriate, for gas analysis to determine dry molecular weight;

Method 4 of Appendix A to 40 CFR Part 60, to determine stack gas moisture;

Method 25 or 25A, to determine the total gaseous organic mass emissions as carbon at the inlet and outlet of the thermal oxidizer, simultaneously, using:

Method 25 if testing an oxidizer with expected carbon concentrations to exceed 50 ppm; or

Method 25A if testing an oxidizer with expected carbon concentrations to be 50 ppm or less, or if the control is not an oxidizer; and

Method 204A through 204F (appropriate method) of Appendix M to 40 CFR Part 51 to determine the capture efficiency.

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

e. The total gaseous organic emissions mass flow rates shall be determined at the inlet and the outlet of the thermal oxidizer for each of the 3 test runs.

f. The combustion temperature, defined as the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs, must be monitored and recorded at least once every 15 minutes during each of the 3 test runs. The average combustion temperature calculated from this data is the minimum operating limit for the thermal oxidizer.

g. During the compliance demonstration for the permanent total enclosure, monitoring devices shall be installed to measure the average facial velocity of the air flow through each natural draft opening.

h. Method 2 from 40 CFR Part 60, Appendix A shall be conducted to determine the volumetric flow rate of the exhaust stream(s) exiting the permanent total enclosure, corrected to standard conditions. If the building is being used as the permanent total enclosure, it may be necessary to measure the volumetric flow, corrected to standard conditions, of each gas stream entering the "enclosure" through a forced makeup air duct, using Method 2. The facial velocity (FV) shall be calculated using the following equation:

$FV = (Q_o - Q_i) / A_n$

where:

Q_o is the sum of the volumetric flow from all gas streams exiting the enclosure through an exhaust duct or hood;

Q_i is the sum of the volumetric flow from all gas streams into the enclosure through a forced makeup air duct, and is equal to zero if there is no forced makeup air into the enclosure; and

A_n is the total area of all natural draft openings in the enclosure.

i. If the average facial velocity is measured at greater than 500 feet per minute (9,000 m/hr), the direction of air flow shall be assumed to be inward at all times during the compliance demonstration. If the average facial velocity is measured at less than 500 feet per minute, the continuous inward flow of air shall be verified at least once every 10 minutes for a minimum of 1 hour during the compliance demonstration, either by checking the flow or pressure meter(s) or through the use of streamers, smoke tubes, or tracer gases. All closed access doors and windows that are not considered natural draft openings shall also be checked once during the compliance demonstration for leakage around their perimeters using smoke tubes or tracer gases.

j. The permittee shall also measure and record the following information for the permanent total enclosure and each natural draft opening:

i. the diameter of each natural draft opening;

ii. the distance measured from each natural draft opening to each VOC emitting point in the process;

iii. the distance measured from each exhaust duct or hood in the enclosure to each natural draft opening;

iv. the total surface area of each natural draft opening and the surface area of the enclosure's four walls, floor and ceiling; and

v. the ratio of the total surface area (sum) of all natural draft openings to the total surface area of the permanent total enclosure.

k. 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).

l. 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.

m. 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: PTI P0108773, 40 CFR 51, Appendix M, Method 204, 40 CFR Part 63, Subpart MMMM and OAC rule 3745-77-07(C)(1)]

(4) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart MMMM, including the following sections:

63.3964(a)	Conduct each performance test according to requirements in 63.7(e)(1) and under representative conditions
63.3964(b)	Conduct each performance test of an emission capture system per 63.3965, and each add-on control device per 63.3966
63.3965(a)	Assuming 100 percent capture efficiency
63.3965(b)	Measuring capture efficiency
63.3965(c)	Liquid-to-uncaptured-gas protocol using a temporary total enclosure or building enclosure

63.3965(d)	Gas-to-gas protocol using a temporary total enclosure or a building enclosure
63.3965(e)	Alternative capture efficiency protocol
63.3966	Determining add-on control device emission reduction or removal efficiency
63.3967(a)	Establishing operating limits for thermal oxidizers
63.3967(f)	Establishing operating limits for emission capture systems

[Authority for term: 40 CFR Part 63, Subpart MMMM]

g) Miscellaneous Requirements

(1) None.