



Environmental Protection Agency

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

5/29/2012

Certified Mail

Mr. Andrew Shimko
Seaman Corporation
1000 Venture Blvd.
Wooster, OH 44691

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0285030351
Permit Number: P0109814
Permit Type: Initial Installation
County: Wayne

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Daily Recorder. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification
Ohio EPA-NEDO; Canada

PUBLIC NOTICE
5/29/2012 Issuance of Draft Air Pollution Permit-To-Install

Seaman Corporation

1000 Venture Blvd.,

Wooster, OH 44691

Wayne County

FACILITY DESC.: Fabric Coating Mills

PERMIT #: P0109814

PERMIT TYPE: Initial Installation

PERMIT DESC: Installation of rotogravure coating line to apply clear or pigmented top coat(s) to polymer coated fabrics

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Zorica Dejanovic, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: Architectural fabric coating line consisting of four rotogravure coating heads, for the application of multiple layers or colors of top finish to vinyl coated fabric produced at the facility.
3. Facility Emissions and Attainment Status: The facility has requested HAP and VOC emission limitations to avoid MACT Subpart JJJJ and PSD.
4. Source Emissions: Either current acrylic formulations or new Kynar coatings will be applied at this emissions unit. Each coating head will have a total enclosure with an interlock device to prevent operation when the doors are opened. The primer and top coat contain 80-90% VOC and all emissions from the coating heads used in these applications will be vented to the RTO's. However, most of the new coatings are water-based, and will not require emission controls. Allowable facility-wide VOC emissions (based on the TV permit) are 217.4 tons/year. The new line will increase the allowable emissions to 239.5 tons/year. Actual, controlled, facility-wide VOC emissions (data taken from record keeping, reporting and emission testing) are expected to be less than 30 tons/year with the addition of the new line.
5. Conclusion: Facility-wide VOC/HAP restrictions and control & removal efficiency limitations will sufficiently maintain emissions below major source thresholds.
6. Please provide additional notes or comments as necessary:
None
7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
Single HAP	9.9
Combined HAPs	24.9
VOC	22.2



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
Seaman Corporation**

Facility ID:	0285030351
Permit Number:	P0109814
Permit Type:	Initial Installation
Issued:	5/29/2012
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Seaman Corporation

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Authorization

Facility ID: 0285030351
Facility Description: Manufacturer of PVC and polyurethane coated fabric for industrial uses.
Application Number(s): A0043866
Permit Number: P0109814
Permit Description: Installation of rotogravure coating line to apply clear or pigmented top coat(s) to polymer coated fabrics
Permit Type: Initial Installation
Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 5/29/2012
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Seaman Corporation
1000 Venture Blvd.
Wooster, OH 44691

of a Permit-to-Install for the emissions unit(s) identified on the following page.

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

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

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0109814

Permit Description: Installation of rotogravure coating line to apply clear or pigmented top coat(s) to polymer coated fabrics

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

Emissions Unit ID:	K006
Company Equipment ID:	Coating Line 14
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

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

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.



- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have

been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.



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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

Effective Date: To be entered upon final issuance

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 Ohio EPA has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions unit K006. The permittee shall comply with the provisions of the plan (as specified in Part C - Emissions Unit Terms and Conditions) during any operation of the aforementioned emissions unit.

C. Emissions Unit Terms and Conditions



1. K006, Coating Line 14

Operations, Property and/or Equipment Description:

Four-head rotogravure coating line for application of solvent or water based top finishes to continuous web of vinyl coated fabric; each coating head enclosed by a permanent total enclosure (PTE) which vents to RTOs 1 and 2

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) d)(11), d)(12), d)(13), d)(14) and e)(3)

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.	ORC 3704.03(T)	<p>Volatile organic compound (VOC) emissions shall not exceed 23.3 lbs/hr.</p> <p>See b)(2)d, b)(2)e, b)(2)f and b)(2)g.</p>
b.	OAC rule 3745-31-05(D) Synthetic minor to avoid MACT and PSD	See b)(2)b and b)(2)c.
c.	OAC rule 3745-31-05(F) Voluntary restriction to align requirements with permits for other units. These requirements are similar to, but more stringent than NSPS and OAC requirements.	<p>*Facility-wide VOC emissions from cleanup operations shall not exceed 6.0 tons/year.</p> <p>VOC content of coatings, excluding water and exempt solvents, shall not exceed the following:</p> <p>0.9 lb/lb coating (6.78 lbs/gal) for top finish; 0.8 lb/lb coating (5.68 lbs/gal) for primer; and 0.02 lb/lb coating (0.21 lb/gal) for water-based mid/top coats.</p> <p>See b)(2)d, b)(2)e, b)(2)f and b)(2)g.</p>
d.	OAC rule 3745-21-09(G)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
e.	OAC rule 3745-21-09(H)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
f.	40 CFR Part 64 CAM	See b)(2)h.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 60, Subpart FFF	The emission limitations, monitoring, record keeping, reporting, test methods and procedures required by this applicable rule are either less stringent or equal to the emission limitations, monitoring, record keeping, reporting, test methods and procedures established pursuant to ORC 3704.03 and OAC rule 3745-31-05.
h.	ORC 3704.03(F)(4)	See d)(11), d)(12), d)(13), d)(14) and e)(3).

(2) Additional Terms and Conditions

- a. The permittee proposed the following restrictions to avoid MACT requirements under 40 CFR Part 63:
 - i. *facility-wide emissions of individual hazardous air pollutant (HAP) shall not exceed 9.9 tpy, based upon a rolling, 12-month summation; and
 - ii. *facility-wide emissions of total combined HAPs shall not exceed 24.9 tpy, based upon a rolling, 12-month summation.
- b. The permittee proposed the following restriction to avoid PSD requirements:
 - i. VOC emissions shall not exceed 22.2 tons/year as a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of HAP(s) and VOC(s), in tons		
	Single HAP	Combined HAPs	VOCs K006
1	0.88	2.075	1.85
1-2	1.70	4.15	3.70
1-3	2.52	6.22	5.55
1-4	3.34	8.30	7.40
1-5	4.16	10.37	9.25
1-6	4.98	12.45	11.10
1-7	5.80	14.52	12.95
1-8	6.62	16.60	14.8
1-9	7.44	18.67	16.65
1-10	8.26	20.75	18.5
1-11	9.08	22.82	20.35
1-12	9.9	24.90	22.2

Effective Date: To be entered upon final issuance

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with these annual emission limitations shall be based upon a rolling, 12-month summation of the emissions.

*The facility includes the following emissions units: K001, K002, K003, K004, K005, K006, P002, P003, P005, P006, P007, and P008.

- c. Except where employing water-based top coats, all of the VOC emissions from this emissions unit shall be vented to the thermal oxidizer that shall meet the operational, monitoring and record keeping requirements of this permit when the emissions unit is in operation. The oxidizer shall have a VOC destruction efficiency of at least 97%, by weight.
- d. A permanent total enclosure (PTE) shall be constructed to totally enclose the coating heads such that all VOC emissions are captured, contained and directed to the control device.
- e. The permittee has the option to perform an additional demonstration to show that each PTE cannot be compromised under normal plant conditions when the emissions unit is in operation in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE cannot be compromised under normal plant conditions when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restrictions, monitoring, record keeping and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration to show that the PTE cannot be compromised or if the additional demonstration indicates that the PTE can be compromised, the permittee shall comply with the differential pressure operational restriction, monitoring, record keeping and reporting requirements, specified in sections b)(2)f, b)(2)g, c)(1), d)(7), d)(8) and e)(2)h to ensure the ongoing integrity of the PTE.

- f. 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/ minute (fpm) [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:

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

- ii. The total area of all natural draft openings (A_N) shall not exceed 5% 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 fpm or 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% surface area determination in "b", 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.

- g. 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.
- h. This emissions unit is a pollutant specific emissions unit for VOC according to 40 CFR Part 64 and has developed a CAM plan.

c) Operational Restrictions

- (1) The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 in. H₂O), or an average facial velocity at each natural draft opening of 200 fpm or greater, whenever the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect the following information each month for all clean-up materials applied at this facility:
 - a. the name and identification number of each cleanup material employed;
 - b. the VOC content of each cleanup material, in lbs VOC/lb coating;
 - c. the amount of cleanup material used less the amount recovered, in lbs; and
 - d. the total VOC emissions from all cleanup material, in lbs/month.

- (2) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)¹ that are applied at this facility:
- a. the name and identification number/code of each coating, thinner, additive, clean-up material and any other material containing any HAP;
 - b. the name/identification of each individual HAP contained in each material applied (and identified in "a" above) and the pound(s) of each HAP per pound of each HAP-containing material applied;
 - c. the number of pounds of each coating, thinner, additive, clean-up material and other material applied during the month;
 - d. for each individual HAP, the total uncontrolled emissions from the controlled coating operations for the month, in ton(s), i.e., for each individual HAP, the summation of the products of "b" times "c" for all the coatings, thinners, additives and other materials (not including clean-up materials) applied during the month, where the emissions are captured and introduced to the control system, divided by 2,000 pounds;
 - e. for each individual HAP, the total uncontrolled emissions from the clean-up materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of "b" times "c" for all the clean-up materials applied during the month, divided by 2,000 pounds
 - f. the total uncontrolled combined HAPs emissions from the controlled operations for all the coatings, thinners, additives and other materials (not including clean-up materials) applied during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from "d" above;
 - g. the total uncontrolled combined HAPs emissions from all the clean-up materials applied during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from "e" above;
 - h. for each individual HAP, the sum of (i) the calculated, controlled emission rate from all the coatings, thinners, additives and other materials (not including clean-up materials) employed during the month, in ton(s), i.e., the total uncontrolled individual HAP emission rate calculated in "d" above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance, and (ii) the uncontrolled individual HAP emissions from the clean-up materials employed during the month, as calculated in "e" above;
 - i. for combined HAPs, the calculated total combined HAPs emission rate for all the materials employed in the controlled coating and uncontrolled clean-up operations during the month, i.e., the summation of the total emissions of each of the individual HAP emission rates calculated in "h" above;
 - j. for each individual HAP, the calculated total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded

in "h" above, for the present month plus the previous 11 months of operation, in ton(s); and

- k. the calculated total combined HAP emissions during the rolling, 12-month period, i.e., the summation of all HAP emissions, as recorded in "i" above, for the present month plus the previous 11 months of operation, in ton(s).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting the Ohio EPA Northeast District Office. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and clean-up materials.

- (3) The permittee shall collect the following information each month for this emissions unit:
 - a. the name and identification of each coating employed;
 - b. the VOC content of each coating employed, in lbs VOC/lb coating;
 - c. the VOC content of each coating employed, less water and exempt solvents, in lbs VOC/lb coating;
 - d. the number of pounds of each coating employed;
 - e. the total VOC emissions from all coatings, in pounds; and
 - f. the total VOC emissions for the previous rolling, 12-months.
- (4) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit controlled by the thermal oxidizer is in operation, shall not be more than 50° F below the average temperature measured during the most recent performance test that demonstrated the emissions unit was in compliance.
- (5) 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 $\pm 1\%$ of the temperature being measured or $\pm 5^\circ$ F, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the thermal oxidizer is required to demonstrate compliance with the VOC limitation contained in this permit:
 - a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50° F below the average

temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

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

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

- (6) 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.

- (7) 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% of the sum of the surface areas of the enclosure's four walls, floor and ceiling.
- (8) The permittee shall install, operate and maintain monitoring devices and a recorder that continuously monitor and record the differential pressure between the inside and outside of 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 difference in pressure between the PTE and the surrounding areas is not maintained at or above the minimum pressure differential of 0.007 inch of water as a 3-hour average, or when the average facial velocity at any natural draft opening was less than 200 fpm; and
 - b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.
- (9) The CAM plan for monitoring the control efficiency of the control equipment for this emissions unit has been developed for the monitoring of the combustion temperature within the thermal oxidizer. The CAM performance indicator and indicator range for this temperature requirement is specified in (4). When the temperature is outside of the indicator range, corrective action (including, but not limited to, an evaluation of the thermal oxidizer) will be required.

Upon detecting an excursion of the oxidizer's temperature range, the permittee shall restore operation of the emissions unit (including the control device) to its normal or

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

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

- a. install, calibrate, maintain and operate a flow control position indicator, at each of the four coating heads, that actuates an audible alarm when the exhaust stream is diverted from the oxidizer when the emissions unit is in operation; or
- b. visually confirm that each coating head bypass damper is in the correct position whenever the emissions unit is in operation

Any audible alarm shall be immediately investigated. In the event the damper has malfunctioned, the process shall immediately begin safe shutdown procedures and remain shutdown until repairs are complete. The monitoring system shall be inspected monthly to ensure proper function.

The permittee shall record the flow control/bypass damper position, results of any visual inspections, a description of any corrective actions (if necessary) and the duration of any control device bypass. The results of the inspections shall be recorded in a maintenance log.

- (10) 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.
- (11) The PTI application for this emissions unit, K006, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over 1 ton/year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. the TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. this standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the MAGLC:

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. the following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m³): 73.36

Maximum Hourly Emission Rate (lbs/hr): 1.28

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 14.98

MAGLC (ug/m³): 1794

The permittee, has demonstrated that emissions of Toluene from emissions unit K006, are calculated to be less than 80% of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (12) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (13) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (14) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air

Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (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 acceptable range;
 - 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. all excursions (i.e., findings that the bypass monitoring procedure has not been followed, the bypass monitoring system is not operable, or that the required bypass damper/monitoring system inspections have not been conducted) of the bypass indication monitoring required by section d)(9);
 - g. all 3-hour blocks of time, when the emissions unit was in operation, during which the PTE was not maintained at the minimum pressure differential of 0.007 inch of water, or any weekly reading when the average facial velocity at natural draft openings was less than 200 fpm;
 - h. all exceedances of the rolling, 12-month HAP emissions limitations for individual and total combined HAPs;
 - i. during the first 12 calendar months of operation, all exceedances of the cumulative monthly individual HAP and total combined HAP emission limitations;
 - j. any exceedance of the annual clean-up emission limitation;
 - k. any exceedance of the VOC coating content limit; and

- I. any exceedance of the annual VOC emission limitation.

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

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

- (2) The permittee shall submit quarterly summaries of the following records:
 - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50° F below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
 - b. 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; and
 - c. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s).

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

- (3) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:
 - a. the original model input;
 - b. the updated model input;
 - c. the reason for the change(s) to the input parameter(s);
 - d. a summary of the results of the updated modeling, including the input changes; and
 - e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions unit(s), or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect.

f) **Testing Requirements**

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

a. Emission Limitation:

VOC emissions shall not exceed 23.3 lbs/hr

Applicable Compliance Method:

This emission limitation is based upon the emissions unit's controlled potential to emit using the worst case coating blend and was derived from the following equation:

$$[(P + TF)(1-0.97) + (MC)](0.98) = 23.3 \text{ lbs/hr}$$

where:

P = Primer: (272 lbs/hr)(80% VOC) = 217.6 lbs/hr;

MC = Mid Coat: (229 lbs/hr)(2% VOC) = (4.58 lbs/hr)(2) = 9.16 lbs/hr;

TF = Top Finish: (298 lbs/hr)(90% VOC) = 268.2 lbs/hr;

0.97 = the fractional control efficiency; and

0.98 = emission factor, assuming 2% of VOC emitted during mixing and 98% at the coating line.

b. Emission Limitation:

Facility-wide VOC emissions from cleanup operations shall not exceed 6.0 tons/year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).

c. Emission Limitation:

VOC content of coatings, excluding water and exempt solvents, shall not exceed the following:

0.9 lb/lb coating (6.78 lbs/gal) for top finish;

0.8 lb/lb coating (5.68 lbs/gal) for primer; and

0.02 lb/lb coating (0.21 lb/gal) for water-based mid/top coats.

Applicable Compliance Method:

If required, USEPA Method 24 or formulation data shall be used to determine the VOC/HAP content(s) of each coating and cleanup material.

d. Emission Limitation:

VOC emissions shall not exceed 22.2 tons/year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) and d)(3).

e. Emission Limitation:

Facility-wide emissions of individual HAP shall not exceed 9.9 tpy, based upon a rolling, 12-month summation.

Facility-wide emissions of total combined HAPs shall not exceed 24.9 tpy, based upon a rolling, 12-month summation.

Applicable Compliance Method:

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

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

- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit, and every 2.5 years afterward. The emission testing shall be conducted to demonstrate compliance with the capture and destruction efficiencies.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC and for capture and control efficiencies.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Methods 1- 4 and Method 18, 25 or 25A of 40 CFR Part 60, Appendix A; and

Methods 204 - 204F of 40 CFR Part 51, Appendix M.

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

- d. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in

accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

- f. 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.
- g. 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.

- h. If the average facial velocity is measured at greater than 500 fpm (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 fpm, 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.
- i. 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.
- j. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emission limits and/or control requirements, unless otherwise specified or approved by the Ohio EPA Northeast District Office. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
- k. Not later than 30 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.
- g) Miscellaneous Requirements
- (1) None.