



Environmental Protection Agency

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

8/2/2012

Mr. Michael Kanuch
Enamelac Company (the)
18103 Roseland Road
Cleveland, OH 44112

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318007870
Permit Number: P0109011
Permit Type: Renewal
County: Cuyahoga

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) 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 Plain Dealer. 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
122 South Front Street
Columbus, Ohio 43215

and Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114

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 Cleveland Division of Air Quality at (216)664-2297.

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
CDAQ; Pennsylvania; Canada



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

This facility is a metal parts coating operation. This permit is a renewal FEPTIO for paint spray booths K001-K005, K013 and K109 along with a perchloroethylene vapor degreaser L002. All spray booths have dry filtration system for control of particulate emissions. FEPTIO limits VOC and HAPs for all units at this facility.

3. Facility Emissions and Attainment Status:

Cuyahoga County is currently designated as non-attainment for PM 2.5 and partial nonattainment for lead; the county is in attainment for all other criteria pollutants. K109 is the only emissions unit in this permit that has an emission limitation for particulate emissions (PE): 0.551 lbs/hr and 2.4 tons/yr of PE which was established as BAT in PTI 13-3802 issued 8/28/2001.

4. Source Emissions:

Spray booths K001-K005, K013 and K109 are all limited to 3 gallons per day of coating. There are an additional three dry powder spray booths K010-K012 on the premises but are considered De Minimis units. The addition of toluene to the wet coating, make it the single highest HAP with total potential emissions estimated at 15.7 tons/yr for all seven permitted booths. This is above the 10 tons/yr single HAP threshold. Combined HAP emissions are estimated to be 23.66 tons/yr including the HAPs found in both wet and dry coatings and the HAP from the vapor degreaser (perchloroethylene). This is below the 25 tons/yr combined HAPs threshold. Due to the emission limitation of 3 gal/day of wet coating, the facility-wide VOC emissions are estimated to be at 29.04 tons/yr. This is below the TV threshold. The FEPTIO includes record keeping to demonstrate that the rolling, 12-month summation for actual single HAP emissions does not exceed 10 TPY.

5. Conclusion:

The potential to emit of VOC/HAP has been restricted by limiting the daily throughput for each emissions unit to three gallons per day. Therefore, this facility is a synthetic minor/FEPTIO, and is not subject to the Title V permitting requirements. Record keeping requirements for the rolling, 12-month summation of VOC and HAP emissions and the daily material throughput will ensure the facility stays below the limits in their permit.

6. Please provide additional notes or comments as necessary:

This FEPTIO combines four different PTIs and their associated BAT as follows:

- PTI 13-2698 issued 1/5/1994 for K001-K005
- PTI 13-04378 issued 1/25/2005 for K013
- PTI 13-03802 issued 8/28/2001 for K109
- PTI 13-4100 issued 5/13/2004 for L002

The following Registration permits will also be superseded:

- P0057127 for K001
- P0057128 for K002
- P0057129 for K003
- P0057130 for K004
- P0057131 for K005

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	30
Single HAP	9.9
Combined HAP	24.9
PE	2.41

PUBLIC NOTICE

8/2/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Enamelac Company (the)

18103 Roseland Road,

Cleveland, OH 44112

Cuyahoga County

FACILITY DESC.: Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers

PERMIT #: P0109011

PERMIT TYPE: Renewal

PERMIT DESC: Renewal FEPTIO for paint spray booths K001-K005, K013 and K109 along with a perchloroethylene vapor degreaser L002. FEPTIO limits VOC and HAPs for all units at this facility.

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: David Hearne, Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114. Ph: (216)664-2297

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Enamelac Company (the)**

Facility ID:	1318007870
Permit Number:	P0109011
Permit Type:	Renewal
Issued:	8/2/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Enamelac Company (the)

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Authorization

Facility ID: 1318007870

Application Number(s): A0042983, A0044639

Permit Number: P0109011

Permit Description: Renewal FEPTIO for paint spray booths K001-K005, K013 and K109 along with a perchloroethylene vapor degreaser L002. FEPTIO limits VOC and HAPs for all units at this facility.

Permit Type: Renewal

Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 8/2/2012

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Enamelac Company (the)
18103 Roseland Road
Cleveland, OH 44112

of a Permit-to-Install and Operate 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:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0109011

Permit Description: Renewal FEPTIO for paint spray booths K001-K005, K013 and K109 along with a perchloroethylene vapor degreaser L002. FEPTIO limits VOC and HAPs for all units at this facility.

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

Emissions Unit ID:	K013
Company Equipment ID:	Paint Booth #2/K013
Superseded Permit Number:	13-04378
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	K109
Company Equipment ID:	Paint Booth #1/K109
Superseded Permit Number:	13-03802
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	L002
Company Equipment ID:	Degreaser #2
Superseded Permit Number:	13-04100
General Permit Category and Type:	Not Applicable

Group Name: Wet Paint Booths

Emissions Unit ID:	K001
Company Equipment ID:	Paint Booth #1/K001
Superseded Permit Number:	P0057127
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	Paint Booth #2/K002
Superseded Permit Number:	P0057128
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Paint Booth #3/K003
Superseded Permit Number:	P0057129
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K004
Company Equipment ID:	Paint Booth #4/K004
Superseded Permit Number:	P0057130
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K005
Company Equipment ID:	Paint Booth #5/K005
Superseded Permit Number:	P0057131
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Cleveland Division of Air Quality in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile 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).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

Draft Permit-to-Install and Operate

Enamelac Company (the)

Permit Number: P0109011

Facility ID: 1318007870

Effective Date: To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(1) c)(1)a., c)(2)a., d)(1)-d)(3), e)(1), e)(2), f)(2), and g)(1).

c) 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(D)(1)(b)	VOC emissions from the facility shall not exceed 30 tons/yr, based on rolling, 12-month summation of emissions. Facility-wide VOC emissions from cleanup materials shall not exceed 0.5 ton/yr. See c)(2) below.

(2) Additional Terms and Conditions

a. The maximum annual Hazardous Air Pollutant (HAP) emissions generated at this facility (see c)(2)b.) shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combined HAPs, based on a rolling, 12-month summation of emissions.

b. The facility emission limits shall include emission from the following emissions units: K001, K002, K003, K004, K005, K010, K011, K012, K013, K109 and L002.

d) Operational Restrictions

- (1) The maximum annual volatile organic material usage for the facility (see c)(2)b.) shall not exceed 30 tons, based upon a rolling 12-month summation of the volatile organic material usage figures.
- (2) The maximum annual individual HAP material usage for the facility (see c)(2)b.) shall not exceed 9.9 tons, based upon a rolling 12-month summation of the volatile organic material usage figures.
- (3) The maximum annual combined HAP material usage for the facility (see c)(2)b.) shall not exceed 24.9 tons, based upon a rolling 12-month summation of the volatile organic material usage figures.

e) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the coating operations at this facility (K001-K005, K010-K012, K013, and K109):
 - a. the name and ID number of each coating and cleanup material employed;
 - b. the weight (in pounds per month) of each coating and cleanup material employed as applied;
 - c. the VOC content of each coating and cleanup material employed, as applied, in percent by weight;
 - d. the total volatile organic material usage from all coating and cleanup materials calculated by summing the records of [(1)b. x (1)c.] for each coating and cleanup material, (in pounds per month);
 - e. the total VOC emission generated from all coating and cleanup materials employed calculated by summing the records of [(1)b. x (1)c.] for each coating and cleanup material, and subtracting any recovered material*, (in pounds per month);
 - f. the rolling, 12-month summation of volatile organic material usage from all coating and cleanup materials employed, in tons;
 - g. the individual and combined HAP content for each coating and cleanup material employed, as applied, in percent by weight;
 - h. the total individual and combined HAP material usage from all coating and cleanup materials employed calculated by summing the records of [(1)b. x (1)g.] for each coating and cleanup material, (in pounds per month);
 - i. the total individual and combined HAP emissions generated from all coating and cleanup materials employed calculated by summing the records of [(1)b. x (1)g.] for each coating and cleanup material, (in pounds per month); and

Draft Permit-to-Install and Operate

Enamelac Company (the)

Permit Number: P0109011

Facility ID: 1318007870

Effective Date: To be entered upon final issuance

- j. the rolling, 12-month summation of each individual and combined HAP material usage and emissions from all coating and cleanup materials employed, in tons.

*If a credit for recovered materials is to be used to demonstrate compliance and/or used in calculations for emissions reports; records of the total amount (gallons or pounds) of the materials collected and added to the recovery tank/drum shall be maintained as required in e)(2) below.

- (2) If a credit for recovered materials is to be used to demonstrate facility compliance and/or used in calculations for emission reports, the permittee shall maintain the following records each month for the recovered materials and the recovery drum, or tank, serving these emissions units:

- a. the date the materials from the recovery drum or tank were shipped off site;
- b. the amount of recovered material, (in gallons or pounds) from the recovery drum or tank shipped off site;
- c. the average density of the recovered material, (in pounds per gallon) from the recovery drum or tank (if the amount is recorded in gallons);
- d. the average VOC content for the recovered material, in percent by weight; and
- e. the average VOC emissions from the recovered materials [(2)b. x (2)d.], in pounds per month. Note the average VOC emissions, in pounds per month, from the recovered material is calculated as [(2)b. x (2)c. x (2)d.] if the material amount is recorded in gallons.

f) 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 for the following emissions unit(s) that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- i. an identification for each month during which the rolling, 12-month individual HAP material usage exceeded 9.9 tons/yr based on a rolling, 12-month summation;
- ii. an identification for each month during which the rolling, 12-month individual HAP emissions exceeded 9.9 tons/yr based on a rolling, 12-month summation;

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Enamelac Company (the)

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- iii. an identification for each month during which the rolling, 12-month combined HAP material usage exceeded 24.9 tons/yr based on a rolling, 12-month summation;
- iv. an identification for each month during which the rolling, 12-month combined HAP emissions exceeded 24.9 tons/yr based on a rolling, 12-month summation;
- v. an identification of each month during which the rolling, 12-month volatile organic material usage exceeded 30 tons/yr based on a rolling, 12-month summation;
- vi. an identification of each month during which the rolling, 12-month VOC emissions exceeded 30 tons/yr based on a rolling, 12-month summation;
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Cleveland Division of Air Quality.

g) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in c) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
30 tons VOC per rolling, 12-month period for this facility (see c)(2)b.)

Applicable Compliance Method:
Compliance shall be determined based on the recordkeeping specified in e)(1) and e)(2) above.
 - b. Emission Limitation:
9.9 tons individual HAP emissions per rolling, 12-month period for this facility (see c)(2)b.)

Draft Permit-to-Install and Operate

Enamelac Company (the)

Permit Number: P0109011

Facility ID: 1318007870

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping specified in e)(1) above.

c. Emission Limitation:

24.9 tons combined HAP emissions per rolling, 12-month period for this facility (see c)(2)b.)

Applicable Compliance Method:

Compliance shall be determined based on the recordkeeping specified in e)(1) above and include the actual annual amount of perchloroethylene emissions from L002 determined in accordance with section C.4.f)(1)a..

d. Emission Limitation:

Facility-wide VOC emissions from cleanup material shall not exceed 0.5 ton/yr.

Applicable Compliance Method:

Compliance shall be determined bases on records from cleanup from e)(1) and e)(2).

- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner of operator determines that Method 24 cannot be used for a particular coating, the permittee 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.

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

h) Miscellaneous Requirements

- (1) None.

2. The following emissions unit contained in this permit is subject to 40 CFR Part 63, Subpart T, National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning: L002. The complete NESHAP requirements, including the Subpart A General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website at <http://ecfr.gpoaccess.gov> or by contacting the Cleveland Division of Air Quality (CDAQ).

The permittee must comply with all applicable requirements of 40 CFR Part 63, Subpart T. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart T (General Provisions) as identified in Table 10 of 40 CFR Part 63, Subpart T. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart T, and Subpart A.

3. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants (NESHAP) Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time

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Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Wet Paint Booths: K001,K002,K003,K004,K005,

EU ID	Operations, Property and/or Equipment Description
K001	Paint spray booth for misc metal parts located at 18103 Roseland.
K002	Paint spray booth for misc metal parts located at 18103 Roseland.
K003	Paint spray booth for misc metal parts located at 18103 Roseland.
K004	Paint spray booth for misc metal parts located at 18103 Roseland.
K005	Paint spray booth for misc metal parts located at 18103 Roseland.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 13-2698 issued 1/5/1994	Volatile organic compound (VOC) emissions from coatings shall not exceed 21 lbs/day and 3.83 tons/yr, for each emissions unit.
b.	OAC rule 3745-21-09(U)(2)(e)(ii)	The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts, for each emissions unit.
c.	OAC rule 3745-31-05(D)(1)(b)	See section B.

(2) Additional Terms and Conditions

- a. The above emissions units are exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11(B) is not applicable.
- b. The coating usage for each emissions unit is less than five gallons of coating per day for each spray booth. Therefore, pursuant to OAC rule 3745-17-11(A)(1)(i), this rule does not apply to the above mentioned emissions units.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for each emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating, in pounds per gallon, as employed;
 - c. the amount, in gallons, of each coating employed;
 - d. the total amount, in gallons, of all coatings employed; and
 - e. the daily VOC emissions from all coatings employed, in pounds or tons (sum of b. x c. for each coating, and subtracting any recovered material*).

*If credit for recovered material is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the materials collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section B.1.(e)(2).

e) Reporting Requirements

- (1) The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 3 gallons per day. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 45 days after the exceedances occurs and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measure which have been, or will be taken, to correct the situation.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions shall not exceed 21 lbs/day from coatings for each emissions unit

Applicable Compliance Method:

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

b. Emission Limitation:

VOC emissions shall not exceed 3.83 tons/yr from coatings for each emissions unit

Applicable Compliance Method:

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

c. Emission Limitation:

3 gallons of coating per day for each emissions unit

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in (d)(1) and summing the daily emissions for each calendar year and divide by 2000 lbs/ton.

- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner of operator determines that Method 24 cannot be used for a particular coating, the permittee 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.

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

g) Miscellaneous Requirements

- (1) None.

2. K013, Paint Booth #2/K013

Operations, Property and/or Equipment Description:

Global Finishing Solutions Model # FP676. Floor mounted, dry arrestor, paint spray booth w/ disposable filters. Craftsman 2.5 gal. pressure tank w/ Binks 2001 Spray Gun for coating misc metal parts. (5.58 ft wide x 6.63 ft high x 6.0 ft working depth)

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 13-04378 issued 1/25/2005	Volatile organic compound (VOC) emissions shall not exceed 21 lbs/day and 3.83 tons/yr, from coatings. The requirements of this rule also includes compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(ii).
b.	OAC rule 3745-21-09(U)(2)(e)(ii)	The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts.
c.	OAC rule 3745-31-05(D)(1)(b)	See section B.

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- (2) Additional Terms and Conditions
- a. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11(B) is not applicable.
 - b. The coating usage for the emissions unit is less than five gallons of coating per day for the spray booth. Therefore, pursuant to OAC rule 3745-17-11(A)(1)(i), this rule does not apply to the above mentioned emission unit.
- c) Operational Restrictions
- (1) The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating, in pounds per gallon, as employed;
 - c. the amount, in gallons, of each coating employed;
 - d. the total amount, in gallons, of all coatings employed; and
 - e. the daily VOC emissions from all coatings employed, in pounds or tons (sum of b. x c. for each coating, and subtracting any recovered material*).
- *If credit for recovered material is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the materials collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section B.1.(e)(2).
- (2) The permittee shall maintain records that document any time periods when the dry filtration system was not in service when the emission unit was in operation.
 - (3) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), K013, 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/these emissions unit(s) 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 one ton per 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:

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- 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 Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- 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: Xylene (36.82% by weight of coating VOC content, as applied)

TLV (mg/m3): 434360

Maximum Hourly Emission Rate (lbs/hr): 33.13 (total coating VOC content, as applied)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2151.81

MAGLC (ug/m3): 10341.9

The permittee, has demonstrated that emissions of xylene, from emissions unit(s) K013, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (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).

- (4) 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

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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 FEPTIO 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.

- (5) 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.

(6) 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) The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 3 gallons per day. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 45 days after the exceedances occurs and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measure which have been, or will be taken, to correct the situation.

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

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

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

a. Emission Limitation:
VOC emissions shall not exceed 21 lbs/day from coatings

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in (d)(1).

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- b. Emission Limitation:
VOC emissions shall not exceed 3.83 tons/yr from coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in (d)(1) and shall be the sum of the daily emission rates for the calendar year, and divide by 2000 lbs/ton.

- c. Emission Limitation:
3 gallons of coating per day

Applicable Compliance Method:

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

- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner of operator determines that Method 24 cannot be used for a particular coating, the permittee 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.

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

- g) Miscellaneous Requirements

- (1) None.

3. K109, Paint Booth #1/K109

Operations, Property and/or Equipment Description:

JBI Model # 6-7. Floor mounted, dry arrestor, paint spray booth w/ disposable filters. Speedaire 2.5 gal. pressure tank w/ Binks 2001 Spray Gun for coating misc metal parts. (6 ft wide x 7 ft high x 6.0 ft working depth). Paint Booth #1 at 18115 Roseland

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 13-03802 issued 8/28/2001	<p>Volatile organic compounds (VOC) emissions shall not exceed 21 lbs/day and 3.83 tons/yr from coatings.</p> <p>Particulate emissions (PE) shall not exceed 2.41 tons/yr from coatings.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(2)(e)(ii).</p>
b.	OAC rule 3745-21-09(U)(2)(e)(ii)	The permittee shall not use more than 3 gallons of coating material per day for the coating of miscellaneous metal parts.

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c.	OAC rule 3745-17-07(A)(1)	See b)(2)a. below.
d.	OAC rule 3745-17-11(B)	See b)(2)b. below..

(2) Additional Terms and Conditions

- a. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11(B) is not applicable.
- b. The coating usage for the emissions unit is less than five gallons of coating per day for the spray booth. Therefore, pursuant to OAC rule 3745-17-11(A)(1)(i), this rule does not apply to the above mentioned emissions unit.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating employed;
 - b. the VOC content of each coating, in pounds per gallon, as employed;
 - c. the amount, in gallons, of each coating employed;
 - d. the total amount, in gallons, of all coatings employed; and
 - e. the daily VOC emissions from all coatings employed, in pounds or tons (sum of b. x c. for each coating, and subtracting any recovered material*).

*If credit for recovered material is to be used to demonstrate compliance and/or used in calculations for emission reports; records of the total amount (gallons or pounds) of the materials collected and added to the recovery tank/drum (for recycle, recovery, and/or disposal at an outside facility) shall be maintained as required in Section B.1.(e)(2).

e) Reporting Requirements

- (1) The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 3 gallons per day. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 45 days after the exceedances occurs and shall include a copy of any such record; an identification of the probable cause for such deviation; and any corrective actions or preventative measure which have been, or will be taken, to correct the situation

- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

- a. Emission Limitation:

VOC emissions from coatings shall not exceed 21 lbs/day from coatings

Applicable Compliance Method:

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

- b. Emission Limitation:

VOC emissions from coatings shall not exceed 3.83 tons/yr from coatings

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in (d)(1) and shall be the sum of the daily VOC emissions from the coatings for each calendar year and divide by 2000 lbs/ton.

- c. Emission Limitation:

PE shall not exceed 2.41 tons/yr

Applicable Compliance Method:

The annual PE limitation established in this permit exceeds the emissions unit's potential to emit based on the following formula to determine lbs/hr and then multiplied by 8760 hours/year:

$$E = \text{maximum coating solids usage rate, in pounds per hour,} \times (1-TE) \times (1-CE)$$

Where E = PE 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 (0.75); and

CE = fractional control efficiency of the control equipment (0.85).

Therefore, no daily or annual records are required to demonstrate compliance with this emissions limit.

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- d. Emission Limitation:
3 gallons of coating per day

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in (d)(1).

- (2) In accordance with OAC rule 3745-21-04(B)(5), facilities shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner of operator determines that Method 24 cannot be used for a particular coating, the permittee 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.

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

g) Miscellaneous Requirements

- (1) None.

4. L002, Degreaser #2

Operations, Property and/or Equipment Description:

Baronet Open-top Vapor Degreaser (72 in. long x 30 in. width x 62.5 in. height with 56 in. freeboard, Perchloroethylene Solvent). Model No. BR-625 / Serial No.D-48188.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 13-4100 issued on 5/13/2004	Emissions of perchloroethylene shall not exceed 2.77 tons/yr. The requirements of this rule also include compliance with the requirements of 40 CFR Part 63 Subpart T.
b.	OAC rule 3745-21-09(O)	See b)(2)a. below.
c.	OAC rule 3745-31-05(D)(1)(b)	See section B.

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Enamelac Company (the)

Permit Number: P0109011

Facility ID: 1318007870

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	40 CFR Part 63, Subpart T [In accordance with 40 CFR 63.460 this emission unit is an existing perchloroethylene solvent cleaning machine subject to the emissions limitations/control measures specified in this section.]	See b)(2)b. below.
d.	40 CFR 63.1-16	Appendix B to Subpart T of 40 CFR Part 63 – Applicability of General Provisions to Subpart T shows which parts of the General Provisions in 40 CFR 63.1-16 apply.

(2) Additional Terms and Conditions

- a. In accordance with paragraph (O)(6)(b) of OAC rule 3745-21-09, the requirements of OAC rule 3745-21-09(O)(2)-(O)(5) shall not apply to this emissions unit subject to the federal MACT standards provided the requirements of 40 CFR Subpart T are specified in the permit terms and conditions.
- b. The permittee shall ensure that perchloroethylene monthly emissions from the solvent cleaning machine do not exceed the 3-month rolling average limit of 150 kilograms/square meter per month. This is the same as 30.72 lbs/square feet per month based on a 3-month rolling average (461 lbs/month perchloroethylene emissions rolling average).

c) Operational Restrictions

- (1) The maximum perchloroethylene usage shall not exceed 461 lbs/month, based on a 3-month rolling average.
- (2) The permittee shall comply with the applicable operational restrictions under 40 CFR, Part 63 Subpart T, including the following sections:

63.464(a)	Alternative Standards
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d) Monitoring and/or Recordkeeping Requirements

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

63.464(a)	Maintain log of solvent additions and deletions
63.464(b)	Compliance determination
63.467(c)	Five-year record keeping requirements

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 an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall comply with the applicable reporting requirements under 40 CFR, Part 63 Subpart T, including the following sections:

63.464(c)	Exceedances determination and reporting
63.468(g)	Annual solvent emission report requirements
63.468(h)	Semiannual exceedance report requirements

f) Testing Requirements

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

- a. Emission Limitation:
Perchloroethylene emissions shall not exceed 2.77 tons/yr

Applicable Compliance Method:

To determine the annual perchloroethylene emission rate, the following equation shall be used:

$$E = (L_s - L_w) \times D / 2000$$

Where:

E= VOC emission rate in tons/yr

Ls = liquid volume of cleaning solvent employed each year (gallons)

Lw = liquid volume of cleaning sent off-site as waste (gallons)

D = density of cleaning fluid (lbs/gal)

- (2) The permittee shall comply with the applicable testing requirements under 40 CFR, Part 63 Subpart T, including the following sections:

63.465(b)	Test methods for Alternative Standards
63.465(c)	Determine solvent additions

g) Miscellaneous Requirements

- (1) None.