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

8/15/2012

Certified Mail

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

Mike Radca
USG Interiors, Inc., American Metals Corp., Westlake
1000 Crocker Road
Westlake, OH 44145

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1318617346
Permit Number: P0110374
Permit Type: Administrative Modification
County: Cuyahoga

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully.Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

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

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

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

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
CDAQ; Pennsylvania; Canada

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
USG Interiors, Inc., American Metals Corp., Westlake

Facility ID:	1318617346
Permit Number:	P0110374
Permit Type:	Administrative Modification
Issued:	8/15/2012
Effective:	8/15/2012

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
USG Interiors, Inc., American Metals Corp., Westlake

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Authorization

Facility ID:	1318617346
Facility Description:	Painting steel and aluminum coils
Application Number(s):	M0001779
Permit Number:	P0110374
Permit Description:	PTI Admin Mod for emissions unit K002 which is a coil coating line with infrared curing ovens for steel, aluminum, and hot dipped galvanized metal strips up to 5" wide controlled by a thermal incinerator. PTI #13-3603 was issued on12/22/1999 . This Admin Mod is being processed to match the PTI terms with the Title V permit terms.
Permit Type:	Administrative Modification
Permit Fee:	$0.00
Issue Date:	8/15/2012
Effective Date:	8/15/2012

This document constitutes issuance to:

USG Interiors, Inc., American Metals Corp., Westlake
1000 Crocker Rd.
Westlake, OH 44145

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:

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

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: P0110374
Permit Description: PTI Admin Mod for emissions unit K002 which is a coil coating line with infrared curing ovens for steel, aluminum, and hot dipped galvanized metal strips up to 5" wide controlled by a thermal incinerator. PTI #13-3603 was issued on12/22/1999 . This Admin Mod is being processed to match the PTI terms with the Title V permit terms.

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

Emissions Unit ID:	**K002**
Company Equipment ID:	American Metals Strip Line
Superseded Permit Number:	13-3603
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 Cleveland Division of Air Quality.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, 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 Cleveland Division of Air Quality. 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, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Cleveland Division of Air Quality 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 Cleveland Division of Air Quality 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 Cleveland Division of Air Quality 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 Cleveland Division of Air Quality.

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 Cleveland Division of Air Quality. 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 enteredupon 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

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) None.

2. The emissions unit, K002, contained in this permit is subject to 40 CFR Part 63, Subpart SSSS and 40 CFR Part 60, Subpart TT. The complete MACT and NSPS requirements, including the MACT /NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Cleveland Division of Air Quality (CDAQ).

C. Emissions Unit Terms and Conditions

1. K002, American Metals Strip Line

Operations, Property and/or Equipment Description:

5" wide metal strip coating line which includes: a quench tank, two (2) infrared ovens, and two (2) roller coaters, and thermal incinerator.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable EmissionsLimitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI 13-3603 issued on 12/22/1999	0.83 lb VOC/hr 1.99 tpy VOC 90 % overall emission reduction of VOC
b.	OAC rule 3745-21-09(B)(6)	See b)(2)a. below.
c.	OAC rule 3745-21-09(E)	See b)(2)a. below.
d.	40 CFR Part, 60 Subpart TT	90% overall emission reduction of VOC
e.	40 CFR Part 63, Subpart SSSS (40 CFR 63.5080-63.5200)	See b)(2)b. below. See c)(3) below.
f.	40 CFR 63.1 – 63.15	Table 2 to Subpart SSSS of 40 CFR Part 63 - Applicability of General Provisions to Subpart SSSS shows which parts of the General Provisions in 40 CFR 63.1 - 63.15 apply.

(2) Additional Terms and Conditions

a. The requirements of OAC 3745-21-09(B)(6) and OAC 3745-21-09(E) are less stringent than the requirements of 40 CFR 60, Subpart TT and 40 CFR Part 63, Subpart SSSS.

b. HAP emissions shall not exceed the emission standards established in 40 CFR Part 63, Subpart SSSS (63.5120) using one of the compliance options below:

a) Table 1 to b) 63.5170 Item 3	Use of a capture system and control device	Overall organic HAP control efficiency is at least 98 percent on a monthly basis; or overall organic HAP control efficiency is at least 98 percent during initial performance test and operating limits are achieved; or oxidizer outlet HAP concentration is no greater than 20 ppmv and there is 100 percent capture efficiency during initial performance test and operating limits are achieved continuously for individual coil coating lines.
c) Table 1 to 63.5170 Item 4	Use of a combination of compliant coatings and control devices and maintaining an acceptable equivalent emission rate	d) Average equivalent emission rate does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly.

c.

c) Operational Restrictions

(1) The permittee shall operate and maintain the thermal incinerator in accordance with the manufacturer's recommendations, instructions and operating manual(s).

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

63.5121(a)	Incinerator combustion temperature operating limits specified in Table 1 of Subpart SSSS established during performance test, and capture system monitoring plan.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall have the thermal oxidizer inspected every six months using preventive maintenance procedures recommended by the equipment manufacturer. Each inspection shall include a written report identifying any needed repairs to the thermal oxidizer. If repairs are needed, this emissions unit shall not be operated if the operation would result in any exceedance of the overall control efficiency and temperature requirement of the thermal oxidizer. These repairs shall be completed within 30 days of the inspection. If a time period longer than 30 days is needed to complete the repairs, the Cleveland Division of air Quality (CDAQ) shall be notified in writing. This notice shall list the repairs needed and the reason(s) the repairs could not be

accomplished within the required time period. All inspection and repair reports shall be kept by the permittee for a period of 5 years and shall be made available to the Director (the CDAQ) upon request.

[Authority for term: [OAC rule 3745-77-07(C)(1), PTI 13-3603]

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

63.5150(a)(3)	Monitor control device operating parameters (collect the temperature data/maintaining the 3-hour average combustion temperature at or above the temperature limit)
63.5150(a)(4)	Monitor capture system operating parameters
63.5190(a)	Record of coatings, and control system efficiencies and parameters

Since K001 and K002 share a common control device, the control device parameter monitoring and record keeping performed for K002 also satisfies the control device parameter monitoring and record keeping requirements for K001 or vice versa. A duplicate record is not required.

[Authority for term: 40 CFR 63.5150 and 63.5190]

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

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

b. the VOC content of each coating, as applied, in pounds per gallon;

c. the amount, in gallons, of each coating employed;

d. the total uncontrolled VOC emissions from all coatings employed, in pounds or tons, (summation of b*c for lbs or b*c/2000 for tons for all coatings employed);

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

f. the total number of hours the emission unit was in operation; and

g. the average hourly emission rate, in lbs/hr (e/f).

e) Reporting Requirements

(1) The permittee shall submit semiannual reports and such other notifications and reports to the Cleveland Division of Air Quality as are required pursuant to 40 CFR Part 63, Subpart SSSS, per the following sections:

63.5180(a) - (h)	Initial Notifications, performance test reports, Notification of Compliance, and semi-annual compliance reports.

Since K001 and K002 share a common control device, the control device parameter reporting performed for K002 also satisfies the control device parameter reporting requirements for K001 or vice versa. A duplicate report is not required.

[Authority for term: 40 CFR 63.5180]

(2) The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. Submittal of the annual fee emissions report shall satisfy this requirement.

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:

0.83 lb VOC/hr

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(4).

b. Emission Limitation:

1.92 tpy VOC

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(4) by summing the monthly emissions for each calendar year.

c. Emission Limitation:

90% overall emission reduction of VOC

Applicable Compliance Method:

Compliance shall be determined through performance testing in accordance with the requirements of f)(2) below and the requirements established in 40 CFR Part

60.463 and shall use the following procedures when using a capture system and a control device to comply with the emission limit specified above:

i. Determine the fraction (F) of total VOC's emitted by the emissions unit that enters the control device using the following equation:

$$F = \frac{\sum_{i=1}^{l} C_{bi} Q_{bi}}{\sum_{i=1}^{l} C_{bi} Q_{bi} + \sum_{i=1}^{p} C_{fi} Q_{fi}}$$

Where:
l = the number of gas streams entering the control device;
p = the number of gas streams emitted directly to the atmosphere;
C_b = the VOC concentration in each gas stream entering the control device (parts per million by volume, as carbon);
C_f = the VOC concentration in each gas stream emitted directly to the atmosphere (parts per million by volume, as carbon); and
Q_b = the volumetric flow rate of each gas stream entering the control device (dry standard cubic meters per hour)
Q_f = the volumetric flow rate of each gas steam emitted directly to the atmosphere (dry standard cubic meters per hour).

ii. Determine the destruction efficiency of the control device (E) using values of the volumetric flow rate of each of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the control device by the following equation:

$$E = \frac{\sum_{i=1}^{n} Q_{bi} C_{bi} - \sum_{j=1}^{m} Q_{aj} C_{aj}}{\sum_{i=1}^{n} Q_{bi} C_{bi}}$$

where:
n = the number of gas streams entering the control device;
m = the number of gas streams leaving the control device and entering the atmosphere.
C_a = the VOC concentration in each gas stream leaving the control device and entering the atmosphere (parts per million by volume, as carbon); and
Q_a = the volumetric flow rate of each gas stream leaving the control device and entering the atmosphere (dry standard cubic meters per hour).

[Note: items i and ii are determined from the performance test. In subsequent months, use the most recent overall destruction efficiency (R).]

iii. Determine the overall reduction efficiency (R) using the following equation:

R = EF

[Authority for term: 40 CFR Part 60.463]

d. Emission Limitation(s):

Using an oxidizer to control organic HAP emissions, the HAP emissions shall not exceed the limits identified in b)(2)b. above.

Applicable Compliance Method:

Compliance shall be determined through performance testing in accordance with the requirements of f)(2) below and the requirements established in 40 CFR Parts 63.5160 and 63.5170 using one or more of the compliance options listed below:

63.5170(c)	Demonstrate an average overall organic HAP control efficiency of at least 98 percent for each month or achieve 100% capture with outlet HAP no greater than 20 ppmv by following the applicable provisions in this section. Alternatively, comply with 63.5170(i).
63.5170(d)	Limit the HAP emission to no more than 0.046 kg/liter of solids as a 12-month average by following the applicable provisions in this section.
63.5170(i)	Follow capture and control system compliance demonstration procedures using a CPMS for a coil coating line: conducting initial performance test, determine capture efficiency, continuously monitoring the operating parameters.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the requirements established in the Title V operating permit.

g) Miscellaneous Requirements

(1) Per USEPA's Applicability Determination Index Control Number M040025, for facilities using thermal incinerators, the MACT Subpart SSSS effluent gas monitoring requirements may be streamlined with the similar NSPS Subpart TT monitoring requirements. It should be noted that while the streamlining of applicable requirements in the Title V permit provides administrative efficiency and clarity, the underlying requirements of NSPS Subpart TT and MACT Subpart SSSS continue to apply independently.