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

9/17/2012

Certified Mail

Facility ID: 0124010098
Permit Number: P0082520
County: Fayette

Todd May
YUSA Corporation
151 Jamison Rd. SW
Washington C.H., OH 43160

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 7/30/2012. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. 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 permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

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

and

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA DAPC, Central District Office

Response to Comments

Facility ID:	0124010098
Facility Name:	YUSA Corporation
Facility Description:	Motor vehicle parts and accessories
Facility Address:	151 Jamison Rd. SW Washington Court House, OH 43160 Fayette County
Permit:	P0082520, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Record Herald on 08/01/2012. The comment period ended on 08/31/2012.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: No public comments were received

a. Comment: None

b. Response: None

Response to Comments

Ohio | Environmental Protection Agency

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
YUSA Corporation

Facility ID:	0124010098
Permit Number:	P0082520
Permit Type:	Renewal
Issued:	9/17/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
YUSA Corporation

Table of Contents

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

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 15
B. Facility-Wide Terms and Conditions 16
C. Emissions Unit Terms and Conditions 22
1. K002, Manual Spray Booth 23
2. K021, Manual Spray Booth 36
3. K022, Manual Spray Booth 48
4. K024, Rotary Adhesive Dipping Machine 60
5. K030, Resin Line No. 2 Rubber Parts Coating Line 70
6. K054, Resin Line No. 3 Coating Machine 73
7. K056, Resin Line #4 80
8. K062, Straight Outer Pipe 87
9. K064, Upper Bracket/Mushrm 99
10. K065, Flex A Inner Pipe 111
11. K067, Stopper Bracket 123
12. K068, Tumble Spray Machine 135
13. K070, Resin Line #5 147
14. P305, 5100-OUTP-04 154
15. Emissions Unit Group -A Group Application Machines: K009,K010,K011,K012, ... 166
16. Emissions Unit Group -B Group Application Machines: K017,K018, ... 174
17. Emissions Unit Group -C Group Application Machines: K032,K033, ... 182
18. Emissions Unit Group -D Group Application Machines: K042,K043, ... 188
19. Emissions Unit Group -E Group Application Machines: K044,K045, ... 197
20. Emissions Unit Group -F Group Application Machines: K057,K058,K059,K060, ... 202
21. Emissions Unit Group -G Group Application Machines: K071,K072, ... 211

Authorization

Facility ID:	0124010098
Facility Description:	Motor vehicle parts and accessories
Application Number(s):	A0012830, A0012831, A0012832, A0037697, A0041508, A0042996
Permit Number:	P0082520
Permit Description:	Renewal Title V permit for manufacturing of motor vehicle parts and accessories.
Permit Type:	Renewal
Issue Date:	9/17/2012
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0082519

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

YUSA Corporation
151 Jamison Rd. SW
Washington Court House, OH 43160

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

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

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

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

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

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

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

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

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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

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

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

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

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

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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

3. Scheduled Maintenance

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

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

4. Risk Management Plans

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

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

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

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

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

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

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

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

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

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

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

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

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

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention RequirementsUnder State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

27. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air

pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

1. All of the following facility-wide terms and conditions are federally enforceable with the exception of those listed in B.1.a) below which are enforceable under state law only:

   a) None.

2. The following emissions units contained in this permit are subject to MACT SubpartMMMM: P006, K002,K009, K010, K011, K012, K017, K018, K021, K022, K024, K032, K033, K042, K043, K044, K045, K057, K058, K059, K060, K062, K064, K065, K067, K068, K071, K072 and P305. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Central District Office.

3. The following emissions units contained in this permit are subject to MACT Subpart DDDDD: B001 and B002. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Central District Office.

   Emissions units B001 and B002 each have a rated capacity of less than or equal to 10MMBtu. Pursuant to 40 CFR Part 63.7506(c), these boilers are not subject to the initial notification requirements, any requirements in the MACT Subpart, or any requirements of the MACT general provisions, Subpart A. In accordance with OAC rule 3745-31-03(A)(1), these boilers may retain the permanent exemption under OAC rule 3745-31-03(A)(1)(a) because the MACT standard does not impose any requirements to the particular emissions units.

4. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21, and/or 40 CFR Part 60 or 63:

EU ID	Operations, Property and/or Equipment Description	
B001	5.23 MMBtu/hr natural gas-fired boiler; Boiler B	PTI 01-4112 40 CFR Part 63, Subpart DDDDD (subject with no applicable requirements)
B002	5.23 MMBtu/hr natural gas-fired boiler; Boiler A	PTI 01-4112 40 CFR Part 63, Subpart DDDDD (subject with no applicable requirements)
B003	2.254 MMBtu/hr Air Make-up Unit (HV-2)	PTI 01-4112
B004	2.254 MMBtu/hr Air Make-up Unit (HV-3)	PTI 01-4112
B005	2.254 MMBtu/hr Air Make-up Unit (HV-4)	PTI 01-4112
B006	3.005 MMBtu/hr Air Make-up Unit (HV-5)	PTI 01-4112
B007	2.254 MMBtu/hr Air Make-up Unit (HV-1)	PTI 01-4112
K004	MRE Paint Dip	PTI 01-1638
K020	Automated Spray Booth	01-6877
K026	Hydro Mt. Paint Line # 1	01-08186
P006	Solvent/Adhesive Storage and Mix Room	PTI 01-5166 40 CFR Part 63, Subpart MMMM

EU ID	Operations, Property and/or Equipment Description	
P012	Matsuda 2000cc Rubber Injection Machine #1	PTI 01-5623
P024	Wakoseki 750cc Rubber Injection Machine #3	PTI 01-5623
P026	Wakoseki 750cc Rubber Injection Machine #5	PTI 01-5623
P028	Wakoseki 750cc Rubber Injection Machine #7	PTI 01-5623
P030	Wakoseki 750cc Rubber Injection Machine #9	PTI 01-5623
P032	Wakoseki 750cc Rubber Injection Machine #11	PTI 01-5623
P033	Wakoseki 750cc Rubber Injection Machine #12	PTI 01-5623
P034	Wakoseki 750cc Rubber Injection Machine #13	PTI 01-5623
P035	Wakoseki 750cc Rubber Injection Machine #14	PTI 01-5623
P036	Wakoseki 750cc Rubber Injection Machine #15	PTI 01-5623
P037	Wakoseki 750cc Rubber Injection Machine #16	PTI 01-5623
P038	Wakoseki 750cc Rubber Injection Machine #17	PTI 01-5623
P054	Matsuda 500cc Rubber Injection Machine #16	PTI 01-5623
P078	Wakoseki 750cc Rubber Injection Machine #18	PTI 01-5624
P081	Wakoseki 750 Injection Press No. 21	PTI 01-5624
P097	14" Compression Press No. 20	PTI 01-6830
P098	14" Compression Press No. 21	PTI 01-6830
P099	14" Compression Press No. 22	PTI 01-6830
P100	14" Compression Press No. 23	PTI 01-6830
P112	Matsuda 500 Injection Press No. 42	PTI 01-6843
P113	Wakoseki 1000 Injection Press No. 1	PTI 01-6843
P114	Wakoseki 1000 Injection Press No. 2	PTI 01-6843
P115	Wakoseki 1000 Injection Press No. 3	PTI 01-6843
P116	Matsuda 500 Injection Press No. 43	PTI 01-7312
P117	Matsuda 500 Injection Press No. 44	PTI 01-7312
P118	Matsuda 500 Injection Press No. 45	PTI 01-7312
P119	Matsuda 500 Injection Press No. 46	PTI 01-7312
P120	Wakoseki 750 Injection Press No. 22	PTI 01-7312
P124	Matsuda 500 Injection Press No. 47	PTI 01-7329
P125	Matsuda 500 Injection Press No. 48	PTI 01-7329
P126	Matsuda 500 Injection Press No. 49	PTI 01-7329
P127	Matsuda 500 Injection Press No. 50	PTI 01-7329
P128	Matsuda 500 Injection Press No. 51	PTI 01-7329
P129	Matsuda 500 Injection Press No. 52	PTI 01-7329
P130	Matsuda 500 Injection Press No. 53	PTI 01-7329
P131	Matsuda 500 Injection Press No. 54	PTI 01-7329
P132	Matsuda 500 Injection Press No. 55	PTI 01-7329
P133	Matsuda 500 Injection Press No. 56	PTI 01-7329
P134	Matsuda 500 Injection Press No. 57	PTI 01-7329
P135	Matsuda 500 Injection Press No. 58	PTI 01-7329
P138	Matsuda 500 Injection Press No. 59	PTI 01-7473
P139	Matsuda 500 Injection Press No. 60	PTI 01-7473
P140	Matsuda 500 Injection Press No. 61	PTI 01-7473
P141	Matsuda 500 Injection Press No. 62	PTI 01-7473
P142	Matsuda 500 Injection Press No. 63	PTI 01-7473
P143	Matsuda 500 Injection Press No. 64	PTI 01-7473

EU ID	Operations, Property and/or Equipment Description	
P144	Matsuda 500 Injection Press No. 65	PTI 01-7473
P145	Matsuda 500 Injection Press No. 66	PTI 01-7473
P154	Matsuda 1000 Injection Press No. 1	PTI 01-7871
P155	Matsuda 1000 Injection Press No. 2	PTI 01-7871
P156	Wakoseki 750 Injection Press No. 23	PTI 01-7871
P157	Wakoseki 750 Injection Press No. 24	PTI 01-7871
P158	Matsuda 500 Injection Press No. 67	PTI 01-7871
P159	Matsuda 500 Injection Press No. 68	PTI 01-7871
P160	Matsuda 500 Injection Press No. 69	PTI 01-7871
P161	Matsuda 500 Injection Press No. 70	PTI 01-7871
P162	Matsuda 500 Injection Press No. 71	PTI 01-7871
P163	Matsuda 500 Injection Press No. 72	PTI 01-7871
P164	Matsuda 500 Injection Press No. 73	PTI 01-7871
P165	Matsuda 500 Injection Press No. 74	PTI 01-7871
P166	Matsuda 500 Injection Press No. 75	PTI 01-7871
P167	Matsuda 500 Injection Press No. 76	PTI 01-7871
P168	Matsuda 500 Injection Press No. 77	PTI 01-7871
P169	Matsuda 500 Injection Press No. 78	PTI 01-7871
P171	Matsuda 1000cc Injection Press # 3	PTI 01-08160
P172	Matsuda 1000cc Injection Press # 4	PTI 01-08160
P173	Matsuda 500cc Injection Press # 79	PTI 01-08160
P174	Matsuda 500cc Injection Press # 80	PTI 01-08160
P175	Natsuda 500cc Injection Press # 81	PTI 01-08160
P176	Matsuda 500cc Injection Press # 82	PTI 01-08160
P177	Matsuda 500cc Injection Press # 83	PTI 01-08160
P178	Matsuda 500cc Injection Press # 84	PTI 01-08160
P179	Matsuda 500cc Injection Press 85	PTI 01-08160
P180	Matsuda 500cc Injection Press # 86	PTI 01-08160
P181	Matsuda 500cc Injection Press # 87	PTI 01-08160
P182	Matsuda 500cc Injection Press # 88	PTI 01-08160
P183	Matsuda 500cc Injection Press # 89	PTI 01-08160
P184	Matsuda 500cc Injection Press # 90	PTI 01-08160
P185	Matsuda 500cc Injection Press # 91	PTI 01-08160
P186	Matsuda 500cc Injection Press # 92	PTI 01-08160
P187	Matsuda 1000cc injection molding press number 5	PTI 01-08448
P193	Matsuda 500cc injection molding press number 98	PTI 01-08448
P194	Matsuda 500cc injection molding press number 99	PTI 01-08448
P195	Matsuda 500cc injection molding press number 100	PTI 01-08448
P196	Matsuda 500cc injection molding press number 101	PTI 01-08448
P197	Matsuda 500cc injection molding press number 102	PTI 01-08448
P198	Matsuda 500cc injection molding press number 103	PTI 01-08448
P203	Wakoseki 750 injection press no. 25	PTI 01-08457
P204	Matsuda 2000 injection press no. 3	PTI 01-08457
P207	Matsuda 1000 injection press no. 6	PTI 01-08457
P208	Matsuda 1000 injection press no. 7	PTI 01-08457
P209	Matsuda 1000 injection press no. 8	PTI 01-08457

EU ID	Operations, Property and/or Equipment Description	
P210	Matsuda 1000 injection press no. 9	PTI 01-08457
P211	Matsuda 1000 injection press no. 10	PTI 01-08457
P212	Matsuda 1000 injection press no. 11	PTI 01-08457
P213	Matsuda 1000 injection press no. 12	PTI 01-08457
P214	Matsuda 1000 injection press no. 13	PTI 01-08457
P215	Matsuda 1000 injection press no. 14	PTI 01-08457
P216	Matsuda 500 injection press no. 108	PTI 01-08457
P217	Matsuda 500 injection press no. 109	PTI 01-08457
P218	Matsuda 500 injection press no. 110	PTI 01-08457
P219	Matsuda 500 injection press no. 111	PTI 01-08457
P220	Matsuda 500 injection press no. 112	PTI 01-08457
P221	Matsuda 500 injection press no. 113	PTI 01-08457
P222	Matsuda 500 injection press no. 114	PTI 01-08457
P223	Matsuda 500 injection press no. 115	PTI 01-08457
P224	Matsuda 500 injection press no. 116	PTI 01-08457
P225	Matsuda 500 injection press no. 117	PTI 01-08457
P226	Matsuda 500 injection press no. 118	PTI 01-08457
P227	Matsuda 500 injection press no. 119	PTI 01-08457
P228	Matsuda 500 injection press no. 120	PTI 01-08457
P229	Matsuda 500 injection press no. 121	PTI 01-08457
P230	Matsuda 500 injection press no. 122	PTI 01-08457
P231	Matsuda 500 injection press no. 123	PTI 01-08457
P232	Matsuda 500 injection press no. 124	PTI 01-08457
P233	Matsuda 500 injection press no. 125	PTI 01-08457
P234	Matsuda 500 injection press no. 126	PTI 01-08457
P235	Matsuda 500 injection press no. 127	PTI 01-08457
P251	Maatsuda 1000 injection press no. 15	PTI 01-08583
P252	Matsuda 1000 injection press no. 16	PTI 01-08583
P253	Matsuda 1000 injection press no. 17	PTI 01-08583
P255	Matsuda 1000 Injection Press No. 18	PTI 01-08800
P256	Matsuda 1000 Injection Press No. 19	PTI 01-08800
P257	Matsuda 1000 Injection Press No. 20	PTI 01-08800
P258	Matsuda 1000 Injection Press No. 21	PTI 01-08800
P259	Sanyu 1000 Injection Press No.1	PTI 01-08930
P260	Sanyu 1000 Injection Press No.2	PTI 01-08930
P261	Sanyu 1000 Injection Press No.3	PTI 01-08930
P262	Sanyu 1000 Injection Press No.4	PTI 01-08930
P263	Sanyu 1000 Injection Press No. 5	PTI 01-08955
P264	Sanyu 1000 Injection Press No. 6	PTI 01-08955
P265	Sanyu 1000 Injection Press No. 7	PTI 01-08955
P266	Sanyu 1000 Injection Press No. 8	PTI 01-08955
P267	Matsuda 1000 injection machine no. 22	PTI 01-01309
P268	Matsuda 1000 injection machine no. 23	PTI 01-01309
P269	Matsuda 1000 injection machine no. 24	PTI 01-01309
P270	Matsuda 1000cc Rubber Injection Machine #25	PTI 01-12101
P271	Matsuda 1000cc Rubber Injection Machine #26	PTI 01-12101

EU ID	Operations, Property and/or Equipment Description	
P272	Matsuda 1000cc Rubber Injection Machine #27	PTI 01-12118
P273	Matsuda 1000cc Rubber Injection Machine #28	PTI 01-12118
P274	Matsuda 1000cc Rubber Injection Machine #29	PTI 01-12118
P275	Matsuda 1000cc Rubber Injection Machine #30	PTI 01-12118
P276	Matsuda 1000cc Rubber Injection Machine #31	PTI 01-12118
P277	Matsuda 1000cc Rubber Injection Machine #32	PTI 01-12118
P278	Matsuda 1000cc Rubber Injection Machine #33	PTI 01-12118
P279	Matsuda 1000cc Rubber Injection Machine #34	PTI 01-12118
P280	Matsuda 1000cc Rubber Injection Machine #35	PTI 01-12118
P281	Matsuda 1000cc Rubber Injection Machine #36	PTI 01-12118
P282	Matsuda 1000cc Rubber Injection Machine #37	PTI 01-12118
P283	Matsuda 1000cc Rubber Injection Machine #38	PTI 01-12118
P284	Matsuda 1000cc Rubber Injection Machine #39	PTI 01-12118
P285	Matsuda 1000cc Rubber Injection Machine #40	PTI 01-12118
P286	Matsuda 1000cc Rubber Injection Machine #41	PTI 01-12118
P292	Sanyu 1000cc Rubber Injection Machine #47	PTI 01-12239
P293	Sanyu 1000cc Rubber Injection Machine #48	PTI 01-12239
P294	Sanyu 1000cc Rubber Injection Machine #49	PTI 01-12239
P295	Sanyu 1000cc Rubber Injection Machine #50	PTI 01-12239
P296	Sanyu 1000cc Rubber Injection Machine #51	PTI 01-12239
P297	Sanyu 1000cc Rubber Injection Machine #52	PTI 01-12239
P298	Sanyu 1000cc Rubber Injection Machine #53	PTI 01-12239
P299	Sanyu 1000cc Rubber Injection Machine #54	PTI 01-12239
P300	Sanyu 1000cc Rubber Injection Machine #55	PTI 01-12239
P301	Sanyu 1000cc Rubber Injection Machine #56	PTI 01-12239
P302	Matsuda 1000cc Rubber Injection Machine #57	PTI P0106091
P303	Matsuda 1000cc Rubber Injection Machine #58	PTI P0106091
P304	Matsuda 1000cc Rubber Injection Machine #59	PTI P0106091
P306	Matsuda 1000cc Rubber Injection Machine #60	PTI P0108903
P307	Matsuda 1000cc Rubber Injection Machine #61	PTI P0108903
P308	Matsuda 1000cc Rubber Injection Machine #62	PTI P0108903
P309	Matsuda 1000cc Rubber Injection Machine #63	PTI P0108903
P310	Matsuda 1000cc Rubber Injection Machine #64	PTI P0108903
P311	Matsuda 1000cc Rubber Injection Machine #65	PTI P0108903
P312	Matsuda 1000cc Rubber Injection Machine #66	PTI P0108903
P313	Matsuda 1000cc Rubber Injection Machine #67	PTI P0108903
P314	Matsuda 1000cc Rubber Injection Machine #68	PTI P0108903
P315	Matsuda 1000cc Rubber Injection Machine #69	PTI P0108903
P316	Matsuda 1000cc Rubber Injection Machine #70	PTI P0108903
P317	Matsuda 1000cc Rubber Injection Machine #71	PTI P0108903

C. Emissions Unit Terms and Conditions

1. K002, Manual Spray Booth

Operations, Property and/or Equipment Description:

Manual spray booth (upstairs). Application of primer and adhesive with three electric ovens and controlled with a permanent total enclosure (PTE) and a regenerative thermal oxidizer (RTO).

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) b)(1)e. and d)(11)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed1.28pounds per hour (lbs/hr) and 5.61 tons per year (TPY), excluding cleanup materials. Particulate emissions (PE) shall not exceed 0.27 lbs/hr and 1.18 TPY. See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (P0110932)	See b)(2)d.
c.	OAC rule 3745-17-11(C)	See c)(1), c)(2), and d)(6) through d)(10)
d.	OAC rule 3745-21-09(U)(1)(i)	The coating(s) applied in this emission unit shall be limited to 5.1 pounds of VOC per gallon of coating solids.
e.	ORC 3704.03(F)(4)(b)	See d)(11)
f.	40 CFR Part 63, Subpart MMMM(40 CFR Part 63.3880-3981)	See b)(2)e.
g.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)f.

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC

changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

b. The hourly VOC limitation was established to reflect the potential to emit for this emissions unit, as vented to a thermal oxidizer. The monitoring, recordkeeping and testing requirements that ensure VOC emissions from this emissions unit are captured and directed to the thermal oxidizer are sufficient to ensure compliance with this limitation.

c. The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit taking into consideration the requirements established under OAC rule 3745-17-11(C) for the control of particulate emissions. The monitoring, recordkeeping, reporting, and testing requirements for the dry particulate filter system as established in the following terms and conditions are sufficient to demonstrate compliance with these limitations.

d. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

i. Permit to install 01-12190 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

(a) the permittee shall control VOC emissions from this emissions unit through the use of a permanent total enclosure (PTE) and a thermal incinerator with a minimum overall control efficiency of 95%;

(b) the PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions from this emissions unit. The operation, monitoring, recordkeeping and reporting associated with the PTE shall be conducted in accordance with 40 CFR Part 63, MACT Subpart MMMM; and

(c) the permittee shall limit emissions to 5.61 tons VOC per year, including cleanup material.

ii. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE for this emissions unit because the uncontrolled potential to emit for PE is less than ten tons per year.

e. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:

i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are controlled by two thermal oxidizers. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart MMMM, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.

f. Table 2 to SubpartMMMM of 40 CFR Part 63 - "Applicability of General Provisions to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

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

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

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

[Authority for term: OAC rule 3745-17-11(C)(2)(e) and OAC rule 3745-77-07(A)(1)]

(3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification of each coating and cleanup material employed;

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

c. the VOC content of each coating and cleanup material, in pounds per gallon;

d. the total uncontrolled VOC emissions from all the coatings employed (i.e., the calculated, controlled VOC emission rate times the total volume of all coatings employed in the line), in pounds or tons; and

e. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons [d)(1)d. multiplied by the control efficiency determined during the most recent stack test that demonstrated the emission unit was in compliance].

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

(2) The permittee shall collect and record the following information each month for the coating line and control equipment:

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

b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

c. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;

d. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied [the controlled VOC emission rate shall be calculated by multiplying the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with d)(2)c. above by 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];

e. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

f. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than

50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

(3) The permittee shall maintain daily records that document any time periods when wet parts and/or parts-racks are exiting the PTE serving this emissions unit.

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

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

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

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

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

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee

determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

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

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

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

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

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

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

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

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

(7) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

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

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

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

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

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

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

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

(11) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the sourceis subject to 40 CFR Part 63, Subpart MMMM.

[Authority for term: ORC 3704.03(F)(4)(b) and OAC rule 3745-77-07(C)(1)]

(12) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(13) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the thermal incinerator's combustion temperature was outside of the acceptable range;

b. an identification of each incident of deviation described in e)(2)a. where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in e)(2)a. where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable range, was determined to be necessary and was not taken;

d. an identification of each incident of deviation described in e)(2)a. where proper records were not maintained for the investigation and/or the corrective action; and

e. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

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

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

(3) The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

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

(4) The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that wet parts and/or parts-racks were exiting the PTE serving this emissions unit The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days after the event occurs.

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

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

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

(6) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(7) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

f) Testing Requirements

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

a. <u>Emissions Limitations:</u>

VOC emissions shall not exceed 1.28 lb/hr and 5.61 TPY, excluding cleanup materials (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

<u>Applicable Compliance Method:</u>

The hourly VOC emissions limitation was established using the following equation:

VOC = (U*Vc)*(1-CE)

where:

VOC = maximum VOC emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

Vc = VOC content of coating (lb/gal)

CE = Overall control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates and multiple VOC contents.

Compliance with the annual limitation shall be based upon the recordkeeping requirements established in d)(1).

b. Emissions Limitations:

PE shall not exceed 0.27 lb/hr and 1.18 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly PE limitation was established using the following equation:

PE = (U*D*S)*(1-TE)(1-CE)

where:

PE = maximum particulate emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

D = coating density (lb/gal)

S = solids content (percent weight)

TE = Transfer efficiency

CE = Control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates, multiple solids contents, and multiple coating densities.

The annual PE limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

c. Emissions Limitation:

VOC emissions shall not exceed 5.61 TPY, including cleanup material (as applicable after the U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

Compliance with the annual limitation shall be based upon the recordkeeping requirements established in d)(1).

d. Emissions Limitation:

The coating(s) applied with this emission unit shall be limited to 5.1 pounds of VOC per gallon of coating solids.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2) and the following equation:

E = [VOC/(M*S)]*[1-CE]

where:

E = maximum emissions (lb VOC/gallon of solid)

VOC = maximum total VOC emissions for all coatings and thinners (lb/hr)

M = maximum coating application rate (gal/hr)

S = Solids content (percent by volume)

CE = RTO control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple solids contents, multiple coating application rates and combined total VOC emissions.

e. Emission Limitation:

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

Compliance Method:

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart MMMM.

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

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

a. The emission testing shall be conducted within 6 months prior to the permit expiration;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;

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

Method 18, Method 25 or Method 25A of 40 CFRPart 60, Appendix A.

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

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

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartMMMM.

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

(6) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

g) Miscellaneous Requirements

(1) None.

2. K021, Manual Spray Booth

Operations, Property and/or Equipment Description:

Small Part Manual Spray Booth (No.3 Primer) controlled with a permanent total enclosure (PTE) and regenerative thermal oxidizer (RTO).

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (P0107943)	Volatile organic compound (VOC) emissions shall not exceed 0.12pound per hour (lb/hr). Particulate emissions (PE) shall not exceed 0.005 lb/hr and 0.02 ton per year (TPY). See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (P0107943)	See b)(2)d.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD)	VOC emissions shall not exceed 0.53 tons per rolling, 12-month period. VOC emissions from this emissions unit shall be reduced by an overall control efficiency of at least 97%. See c)(1)
d.	OAC rule 3745-17-11(C)	See c)(2), c)(3), and d)(3) through d)(7)
e.	OAC rule 3745-21-09(U)(1)(d)	VOC emissions shall not exceed 6.7 pounds per gallon of coating solids.
f.	40 CFR Part 63, Subpart MMMM(40 CFR Part 63.3880-3981)	See b)(2)e.
g.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)f.

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

b. The hourly VOC limitation was established to reflect the potential to emit for this emissions unit, as vented to a thermal oxidizer. The monitoring, recordkeeping and testing requirements that ensure VOC emissions from this emissions unit are captured and directed to the thermal oxidizer are sufficient to ensure compliance with this limitation.

c. The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit, as vented to a particulate filter system. The monitoring, recordkeeping and testing requirements for the particulate filter system, as established in the following terms and conditions, are sufficient to ensure compliance with these limitations.

d. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

i. The Best Available Technology (BAT) requirements under OAC rule3745-31-05(A)(3) do not apply to the VOC emissions fromthis air contaminant source because the calculated annual emission rate for VOCis less than ten tons per year taking into account the federally enforceable rulelimit of 0.53 tons of VOC per rolling, 12-month period established under OAC rule 3745-31-05(D).

ii. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE for this emissions unit because the uncontrolled potential to emit for PE is less than ten tons per year.

e. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:

i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are

controlled a regenerative thermal oxidizer. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart MMMM, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.

f. Table 2 to SubpartMMMM of 40 CFR Part 63 - "Applicability of General Provisions to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) All of the emissions from this emissions unit shall be captured and directed to the RTO whenever the emissions unit is in operation.

[Authority for term:OAC rule 3745-77-07(A)(1)]

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

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

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

[Authority for term: OAC rule 3745-17-11(C)(2)(e) and OAC rule 3745-77-07(A)(1)]

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number for each coating and cleanup material employed;

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

c. the VOC content of each coating and cleanup material, in pounds per gallon;

d. the total monthly VOC emissions, in tons; and

e. the rolling, 12-month VOC emissions, in tons.

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

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

a. the name and identification number of each coating used;

b. the mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

c. the maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily volume-weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of all of the coatings; and

d. the calculated, controlled VOC emission rate, in mass of VOC per unit volume of coating solids, as applied. The controlled VOC emission rate shall be calculated using (a) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with d)(2)c above and (b) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the source was in compliance.

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

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

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

(4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

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

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

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

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

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

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

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

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

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

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

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

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

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

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

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

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

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not

constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

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

(10) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(11) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports 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. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer’s recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

ii. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the emissions were not captured and directed to the RTO;

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

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

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

vi. each incident of deviation described in "ii"or "iii" where proper records were not maintained for the investigation and/or the corrective action(s); and

vii. each rolling, 12-month period during which the total OC emissions from this emissions unit exceeded 0.53 tons.

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

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

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

f) Testing Requirements

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

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

VOC emissions shall not exceed 0.12 lb/hr (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

<u>Applicable Compliance Method:</u>

The hourly VOC emissions limitation was established using the following equation:

VOC = (U*Vc)*(1-CE)

where:

VOC = maximum VOC emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

Vc = VOC content of coating (lb/gal)

CE = Overall control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates and multiple VOC contents.

b. Emissions Limitation:

PE shall not exceed 0.005 lb/hr and 0.02 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly PE limitation was established using the following equation:

PE = (U*D*S)*(1-TE)(1-CE)

where:

PE = maximum particulate emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

D = coating density (lb/gal)

S = solids content (percent weight)

TE = Transfer efficiency

CE = Control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates, multiple solids contents, and multiple coating densities.

The annual PE limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

c. Emissions Limitation:

VOC emissions shall not exceed 0.53 tons per rolling, 12-month period.

Applicable Compliance Method:

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

d. Emissions Limitation:

VOC emissions shall not exceed 6.7 pounds per gallon of coating solids.

Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2) and the following equation:

E = [VOC/(M* S)] * [1-CE]

where:

E = maximum emissions (lb VOC/gallon of solid)

VOC = maximum total VOC emissions for all coatings and thinners (lb/hr)

M = maximum coating application rate (gal/hr)

S = Solids content (percent by volume)

CE = RTO control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple solids contents, multiple coating application rates and combined total VOC emissions.

e. Emission Limitation:

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

Compliance Method:

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart MMMM.

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

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

a. The emission testing shall be conducted within 6 months prior to the permit expiration;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;

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

Method 18, Method 25 or Method 25A of 40 CFRPart 60, Appendix A.

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

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

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartMMMM.

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

(6) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

g) Miscellaneous Requirements

(1) None.

3. K022, Manual Spray Booth

Operations, Property and/or Equipment Description:

Small Part Manual Spray Booth (No.3 Adhesive) controlled with a permanent total enclosure (PTE) and regenerative thermal oxidizer (RTO).

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (P0107943)	Volatile organic compound (VOC) emissions shall not exceed 0.13pound per hour (lb/hr). Particulate emissions (PE) shall not exceed 0.005 lb/hr and 0.02 ton per year (TPY). See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (P0107943)	See b)(2)d.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD)	VOC emissions shall not exceed 0.57 tons per rolling, 12-month period. VOC emissions from this emissions unit shall be reduced by an overall control efficiency of at least 97%. See c)(1)
d.	OAC rule 3745-17-11(C)	See c)(2), c)(3), and d)(3) through d)(7)
e.	OAC rule 3745-21-09(U)(1)(d)	VOC emissions shall not exceed 6.7 pounds per gallon of coating solids.
f.	40 CFR Part 63, Subpart MMMM(40 CFR Part 63.3880-3981)	See b)(2)e.
g.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)f.

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

b. The hourly VOC limitation was established to reflect the potential to emit for this emissions unit, as vented to a thermal oxidizer. The monitoring, recordkeeping and testing requirements that ensure VOC emissions from this emissions unit are captured and directed to the thermal oxidizer are sufficient to ensure compliance with this limitation.

c. The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit, as vented to a particulate filter system. The monitoring, recordkeeping and testing requirements for the particulate filter system, as established in the following terms and conditions, are sufficient to ensure compliance with these limitations.

d. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

i. The Best Available Technology (BAT) requirements under OAC rule3745-31-05(A)(3) do not apply to the VOC emissions fromthis air contaminant source because the calculated annual emission rate for VOCis less than ten tons per year taking into account the federally enforceable rulelimit of 0.57 tons of VOC per rolling, 12-month period established under OAC rule 3745-31-05(D).

ii. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE for this emissions unit because the uncontrolled potential to emit for PE is less than ten tons per year.

e. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:

i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are

controlled a regenerative thermal oxidizer. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart MMMM, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.

f. Table 2 to subpart MMMM of 40 CFR Part 63 - "Applicability of General Provisions to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) All of the emissions from this emissions unit shall be captured and directed to the RTO whenever the emissions unit is in operation.

[Authority for term:OAC rule 3745-77-07(A)(1)]

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

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

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

[Authority for term: OAC rule 3745-17-11(C)(2)(e) and OAC rule 3745-77-07(A)(1)]

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number for each coating and cleanup material employed;

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

c. the VOC content of each coating and cleanup material, in pounds per gallon;

d. the total monthly VOC emissions, in tons; and

e. the rolling, 12-month VOC emissions, in tons.

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

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

a. the name and identification number of each coating used;

b. the mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

c. the maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily volume-weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of all of the coatings; and

d. the calculated, controlled VOC emission rate, in mass of VOC per unit volume of coating solids, as applied. The controlled VOC emission rate shall be calculated using (a) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with d)(2)c above and (b) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the source was in compliance.

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

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

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

(4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

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

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

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

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

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

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

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

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

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

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

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

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

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

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

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

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

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not

constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

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

(10) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(11) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports 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. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer’s recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

ii. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the emissions were not captured and directed to the RTO;

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

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

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

vi. each incident of deviation described in "ii"or "iii" where proper records were not maintained for the investigation and/or the corrective action(s); and

vii. each rolling, 12-month period during which the total OC emissions from this emissions unit exceeded 0.57 tons.

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

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

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

f) Testing Requirements

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

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

VOC emissions shall not exceed 0.13 lb/hr (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

<u>Applicable Compliance Method:</u>

The hourly VOC emissions limitation was established using the following equation:

VOC = (U*Vc)*(1-CE)

where:

VOC = maximum VOC emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

Vc = VOC content of coating (lb/gal)

CE = Overall control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates and multiple VOC contents.

b. Emissions Limitation:

PE shall not exceed 0.005 lb/hr and 0.02 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly PE limitation was established using the following equation:

PE = (U*D*S)*(1-TE)(1-CE)

where:

PE = maximum particulate emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

D = coating density (lb/gal)

S = solids content (percent weight)

TE = Transfer efficiency

CE = Control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates, multiple solids contents, and multiple coating densities.

The annual PE limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

c. Emissions Limitation:

VOC emissions shall not exceed 0.57 tons per rolling, 12-month period.

Applicable Compliance Method:

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

d. Emissions Limitation:

VOC emissions shall not exceed 6.7 pounds per gallon of coating solids.

Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2) and the following equation:

E = [VOC/(M*S)]*[1-CE]

where:

E = maximum emissions (lb VOC/gallon of solid)

VOC = maximum total VOC emissions for all coatings and thinners (lb/hr)

M = maximum coating application rate (gal/hr)

S = Solids content (percent by volume)

CE = RTO control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple solids contents, multiple coating application rates and combined total VOC emissions.

e. Emission Limitation:

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

Compliance Method:

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart MMMM.

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

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

a. The emission testing shall be conducted within 6 months prior to the permit expiration;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;

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

Method 18, Method 25 or Method 25A of 40 CFRPart 60, Appendix A.

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

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

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartMMMM.

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

(6) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

g) Miscellaneous Requirements

(1) None.

4. K024, Rotary Adhesive Dipping Machine

Operations, Property and/or Equipment Description:

Rotary Adhesive Dipping Machine controlled with a permanent total enclosure (PTE) and a regenerative thermal oxidizer (RTO).

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) b)(1)d. and d)(5)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed1.06pounds per hour (lbs/hr) and 4.65 tons per year (TPY), excluding cleanup materials. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (P0110932)	See b)(2)c.
c.	OAC rule 3745-21-09(U)(1)(i)	The coating(s) applied in this emission unit shall be limited to 5.1 pounds of VOC per gallon of coating solids.
d.	ORC 3704.03(F)(4)(b)	See d)(5)
e.	40 CFR Part 63, Subpart MMMM(40 CFR Part 63.3880-3981)	See b)(2)d.
f.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)e.

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been

approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

b. The hourly VOC limitation was established to reflect the potential to emit for this emissions unit, as vented to a thermal oxidizer. The monitoring, recordkeeping and testing requirements that ensure VOC emissions from this emissions unit are captured and directed to the thermal oxidizer are sufficient to ensure compliance with this limitation.

c. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

i. Permit to install 01-12190 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

(a) the permittee shall control VOC emissions from this emissions unit through the use of a permanent total enclosure (PTE) and a thermal incinerator with a minimum overall control efficiency of 95%;

(b) the PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions from this emissions unit. The operation, monitoring, recordkeeping and reporting associated with the PTE shall be conducted in accordance with 40 CFR Part 63, MACT Subpart MMMM; and

(c) the permittee shall limit emissions to 4.65 tons VOC per year.

d. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:

i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are controlled by two thermal oxidizers. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the

compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart MMMM, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.

e. Table 2 to SubpartMMMM of 40 CFR Part 63 - "Applicability of General Provisions to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(2) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification of each coating and cleanup material employed;

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

c. the VOC content of each coating and cleanup material, in pounds per gallon;

d. the total uncontrolled VOC emissions from all the coatings employed (i.e., the calculated, controlled VOC emission rate times the total volume of all coatings employed in the line), in pounds or tons; and

e. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons [d)(1)d. multiplied by the control efficiency determined during the most recent stack test that demonstrated the emission unit was in compliance].

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

(2) The permittee shall collect and record the following information each month for the coating line and control equipment:

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

b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

c. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;

d. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied [the controlled VOC emission rate shall be calculated by multiplying the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with d)(2)c. above by 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];

e. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

f. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

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

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

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

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

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

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

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

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

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

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

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

(5) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the sourceis subject to 40 CFR Part 63, Subpart MMMM.

[Authority for term: ORC 3704.03(F)(4)(b) and OAC rule 3745-77-07(C)(1)]

(6) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(7) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. each period of time when the thermal incinerator's combustion temperature was outside of the acceptable range;

b. an identification of each incident of deviation described in e)(2)a. where a prompt investigation was not conducted;

c. an identification of each incident of deviation described in e)(2)a. where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and

d. an identification of each incident of deviation described in e)(2)a. where proper records were not maintained for the investigation and/or the corrective action.

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

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

(3) The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

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

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

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

(5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(6) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

f) Testing Requirements

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

a. <u>Emissions Limitations:</u>

VOC emissions shall not exceed 1.06 lb/hr and 4.65 TPY, excluding cleanup materials (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

<u>Applicable Compliance Method:</u>

The hourly VOC emissions limitation was established using the following equation:

VOC = (U*Vc)*(1-CE)

where:

VOC = maximum VOC emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

Vc = VOC content of coating (lb/gal)

CE = Overall control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates and multiple VOC contents.

b. Emissions Limitation:

VOC emissions shall not exceed 4.65 TPY (as applicable after the U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

Compliance with the annual limitation shall be based upon the recordkeeping requirements established in d)(1).

c. Emissions Limitation:

The coating(s) applied with this emission unit shall be limited to 5.1 pounds of VOC per gallon of coating solids.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2) and the following equation:

E = [VOC/(M*S)]*[1-CE]

where:

E = maximum emissions (lb VOC/gallon of solid)

VOC = maximum total VOC emissions for all coatings and thinners (lb/hr)

M = maximum coating application rate (gal/hr)

S = Solids content (percent by volume)

CE = RTO control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple solids contents, multiple coating application rates and combined total VOC emissions.

d. Emission Limitation:

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

Compliance Method:

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart MMMM.

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

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

a. The emission testing shall be conducted within 6 months prior to the permit expiration;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;

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

Method 18, Method 25 or Method 25A of 40 CFRPart 60, Appendix A.

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

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

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartMMMM.

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

(6) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

g) Miscellaneous Requirements

(1) None.

5. K030, Resin Line No. 2 Rubber Parts Coating Line

Operations, Property and/or Equipment Description:

Resin Line No. 2 Rubber Parts Coating Line

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	Ohio Administrative Code (OAC) rule 3745-31-05(A)(3) (P0105620)	Organic Compound (OC) emissions shall not exceed 1.16 pound per hour (lb/hr), including clean-up materials and 5.09 tons per year (TPY), including clean-up materials.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information on a monthly basis for the purpose of determining annual organic compound emissions:

a. the company identification for each adhesive, thinning agent, and clean-up material employed;

b. the number of gallons of each adhesive, thinning agent, and clean-up material employed;

c. the OC content of each adhesive, thinning agent, and clean-up material, in pounds per gallon;

d. the total monthly OC emissions for all adhesives, thinning agents, and clean-up materials employed, calculated by multiplying the number of gallons of each

material employed [d)(1)b. above] by the respective OC content for each material [d)(1)c. above]; and

e. the total annual OC emissions for all adhesives, thinning agents, and clean-up materials employed, calculated by summing the total monthly OC emissions [d)(1)d. above] for each calendar year.

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

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

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

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

f) Testing Requirements

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

a. <u>Emissions Limitations:</u>

OC emissions shall not exceed 1.16 lb/hr, including clean-up materials; and
OC emissions shall not exceed 5.09 TPY, including clean-up materials.

<u>Applicable Compliance Method:</u>

Compliance shall be demonstrated by the following equations:

$E_{OC} = E_A + E_T + E_C$, where;

E_{OC} = Maximum hourly organic compound emissions, in lb/hr;

E_A = Hourly adhesive organic compound emissions, in lb/hr, calculated by multiplying the maximum adhesive application rate (0.03 gal/hr) by the OC content of the adhesive (6.03 lb/gal);

E_T = Hourly thinning agent organic compound emissions, in lb/hr, calculated by multiplying the maximum thinning agent application rate (0.09 gal/hr) by the OC content of the thinning agent (7.26 lb/gal); and

E_C = Hourly clean-up material organic compound emissions, in lb/hr, calculated by multiplying the maximum clean-up material application rate (0.05 gal/hr) by the OC content of the clean-up material 6.56 (lb/gal);

Compliance with the annual limitation shall be demonstrated through the recordkeeping requirements identified in d)(1).

If required, compliance shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25A.

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

g) Miscellaneous Requirements

(1) None.

6. K054, Resin Line No. 3 Coating Machine

Operations, Property and/or Equipment Description:

Resin Line #3 Coating Machine

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) b)(1)d., d)(2) through d)(5), and e)(4)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed1.05pounds per hour (lbs/hr) and 4.59 tons per year (TPY). Particulate emissions (PE) shall not exceed 0.13 lb/hr and 0.57 TPY. See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (P0110932)	See b)(2)d.
c.	OAC rule 3745-17-11(C)	See b)(2)e. and c)(1)
d.	ORC 3704.03(F)(3)(c)	See d)(2) through d)(5) and e)(4)

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006,

version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

b. The hourly and annual VOC limitations were established to reflect the potential to emit for this emissions unit. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

c. The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

d. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions and PE for this emissions unit because the uncontrolled potential to emit for VOC andPE is less than ten tons per year.

e. Pursuant to OAC rule 3745-17-11(A)(1)(i), the requirements of OAC rule 3745-17-11(C) do not apply to this emissions unit if the surface coating process uses less than five gallons of coatings per day and the permittee maintains coating usage records, coating purchase records, and/or production records that clearly demonstrate the actual coating usage is less than five gallons per day.

c) Operational Restrictions

(1) The permittee shall not use more than 5 gallons of coating material per day in this surface coating process.

[Authority for term: OAC rule 3745-17-11(A)(1)(i) and OAC rule 3745-77-07(A)(1)]

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 of each coating material employed; and

b. the number of gallons of each coating material employed.

[Authority for term: OAC rule 3745-17-11(A)(1) and OAC rule 3745-77-07(C)(1)]

(2) Emissions unit K054 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:

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., "24" hours per day and "7" 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):

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

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

   Toxic Contaminant: Toluene

   TLV (mg/m3): 75.36

   Maximum Hourly Emission Rate (lbs/hr): 0.62

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6.415

   MAGLC (ug/m3): 1,794

The permittee, has demonstrated that emissions of Toluene, from emissions unit(s) K054, 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).

[Authority for term: ORC 3704.03(F)(3)(c), ORC 3704.03(F)(4) and OAC rule 3745-114-01]

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

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

[Authority for term: ORC 3704.03(F)(3)(c), ORC 3704.03(F)(4) and OAC rule 3745-114-01]

(4) 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.

[Authority for term: ORC 3704.03(F)(3)(c), ORC 3704.03(F)(4) and OAC rule 3745-114-01]

(5) 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.

[Authority for term: ORC 3704.03(F)(3)(c), ORC 3704.03(F)(4) and OAC rule 3745-114-01]

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than 5 gallons per day. The notification shall include a copy of such record and shall be sent to the appropriate District Office or local air agency within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-17-11(A)(1) and OAC rule 3745-77-07(C)(1)]

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

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

(4) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminate Statute", ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:

a. the original model input;

b. the updated model input;

c. the reason for the change(s) to the input parameter(s); and

d. a summary of the results of the updated modeling, including the input changes; and

e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

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

[Authority for term: ORC 3704.03(F)(3)(c), ORC 3704.03(F)(4) and OAC rule 3745-114-01]

f) Testing Requirements

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

a. <u>Emissions Limitations:</u>

VOC emissions shall not exceed 1.05 lbs/hr and 4.59 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

<u>Applicable Compliance Method:</u>

The hourly VOC emissions limitation was established using the following equation:

VOC = (U*Vc)

where:

VOC = maximum VOC emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

Vc = VOC content of coating (lb/gal)

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates and multiple VOC contents.

The annual VOC limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

b. Emissions Limitations:

PE shall not exceed 0.13 lb/hr and 0.57 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly PE limitation was established using the following equation:

PE = (U*D*S)*(1-TE)

where:

PE = maximum particulate emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

D = coating density (lb/gal)

S = solids content (percent weight)

TE = Transfer efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates, multiple solids contents, and multiple coating densities.

The annual PE limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

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

g) Miscellaneous Requirements

(1) None.

7. K056, Resin Line #4

Operations, Property and/or Equipment Description:

Resin Line #4 Coating Machine

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) b)(1)d., d)(2) through d)(5), and e)(4)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 1.00pound per hour (lb/hr) and 4.38 tons per year (TPY). Particulate emissions (PE) shall not exceed 0.13 lb/hr and 0.57 TPY. See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (P0110932)	See b)(2)d.
c.	OAC rule 3745-17-11(C)	See b)(2)e. and c)(1)
d.	ORC 3704.03(F)(3)(c)	See d)(2) through d)(5) and e)(4)

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006,

version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

b. The hourly and annual VOC limitations were established to reflect the potential to emit for this emissions unit. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

c. The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

d. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions and PE for this emissions unit because the uncontrolled potential to emit for VOC andPE is less than ten tons per year.

e. Pursuant to OAC rule 3745-17-11(A)(1)(i), the requirements of OAC rule 3745-17-11(C) do not apply to this emissions unit if the surface coating process uses less than five gallons of coatings per day and the permittee maintains coating usage records, coating purchase records, and/or production records that clearly demonstrate the actual coating usage is less than five gallons per day.

c) Operational Restrictions

(1) The permittee shall not use more than 5 gallons of coating material per day in this surface coating process.

[Authority for term: OAC rule 3745-17-11(A)(1)(i) and OAC rule 3745-77-07(A)(1)]

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 of each coating material employed; and

b. the number of gallons of each coating material employed.

[Authority for term: OAC rule 3745-17-11(A)(1) and OAC rule 3745-77-07(C)(1)]

(2) Emissions unit K056 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:

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., "24" hours per day and "7" 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):

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

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

   Toxic Contaminant: Toluene

   TLV (mg/m3): 75.36

   Maximum Hourly Emission Rate (lbs/hr): 0.62

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6.415

   MAGLC (ug/m3): 1,794

The permittee, has demonstrated that emissions of Toluene, from emissions unit(s) K056, 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).

[Authority for term: ORC 3704.03(F)(3)(c), ORC 3704.03(F)(4) and OAC rule 3745-114-01]

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

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

[Authority for term: ORC 3704.03(F)(3)(c), ORC 3704.03(F)(4) and OAC rule 3745-114-01]

(4) 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.

[Authority for term: ORC 3704.03(F)(3)(c), ORC 3704.03(F)(4) and OAC rule 3745-114-01]

(5) 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.

[Authority for term: ORC 3704.03(F)(3)(c), ORC 3704.03(F)(4) and OAC rule 3745-114-01]

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than 5 gallons per day. The notification shall include a copy of such record and shall be sent to the appropriate District Office or local air agency within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-17-11(A)(1) and OAC rule 3745-77-07(C)(1)]

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

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

(4) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air

Contaminate Statute", ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:

a. the original model input;

b. the updated model input;

c. the reason for the change(s) to the input parameter(s); and

d. a summary of the results of the updated modeling, including the input changes; and

e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

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

[Authority for term: ORC 3704.03(F)(3)(c), ORC 3704.03(F)(4) and OAC rule 3745-114-01]

f) Testing Requirements

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

a. <u>Emissions Limitations:</u>

VOC emissions shall not exceed 1.00 lb/hr and 4.38 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

<u>Applicable Compliance Method:</u>

The hourly VOC emissions limitation was established using the following equation:

VOC = (U*Vc)

where:

VOC = maximum VOC emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

Vc = VOC content of coating (lb/gal)

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates and multiple VOC contents.

The annual VOC limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

b. Emissions Limitations:

PE shall not exceed 0.13 lb/hr and 0.57 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly PE limitation was established using the following equation:

PE = (U*D*S)* (1-TE)

where:

PE = maximum particulate emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

D = coating density (lb/gal)

S = solids content (percent weight)

TE = Transfer efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates, multiple solids contents, and multiple coating densities.

The annual PE limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

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

g) Miscellaneous Requirements

(1) None.

8. K062, Straight Outer Pipe

Operations, Property and/or Equipment Description:

Straight Outer Pipe Adhesive Application Machine #1 controlled with a permanent total enclosure (PTE) and regenerative thermal oxidizer (RTO).

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (P0107943)	Volatile organic compound (VOC) emissions shall not exceed 0.50pound per hour (lb/hr). Particulate emissions (PE) shall not exceed 0.012 lb/hr and 0.05 ton per year (TPY). See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (P0107943)	See b)(2)d.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD)	The combined VOC emissions from emissions units K062, K064, K065, and K067 shall not exceed 8.85 tons per rolling, 12-month period. VOC emissions from this emissions unit shall be reduced by an overall control efficiency of at least 97%. See c)(1)
d.	OAC rule 3745-17-11(C)	See c)(2), c)(3), and d)(3) through d)(7)
e.	OAC rule 3745-21-09(U)(1)(i)	VOC emissions shall not exceed 5.1 pounds per gallon of coating solids.
f.	40 CFR Part 63, Subpart MMMM (40 CFR Part 63.3880-3981)	See b)(2)e.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)f.

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

b. The hourly VOC limitation was established to reflect the potential to emit for this emissions unit, as vented to a thermal oxidizer. The monitoring, recordkeeping and testing requirements that ensure VOC emissions from this emissions unit are captured and directed to the thermal oxidizer are sufficient to ensure compliance with this limitation.

c. The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit, as vented to a particulate filter system. The monitoring, recordkeeping and testing requirements for the particulate filter system, as established in the following terms and conditions, are sufficient to ensure compliance with these limitations.

d. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

i. The Best Available Technology (BAT) requirements under OAC rule3745-31-05(A)(3) do not apply to the VOC emissions fromthis air contaminant source because the calculated annual emission rate for VOCis less than ten tons per year taking into account the federally enforceable operational restriction requiring that all emissions be directed to an RTO with an overall control efficiency of at least 97% established under OAC rule 3745-31-05(D).

ii. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE for this emissions unit because the uncontrolled potential to emit for PE is less than ten tons per year.

e. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:

i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are controlled a regenerative thermal oxidizer. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart MMMM, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.

f. Table 2 to subpart MMMM of 40 CFR Part 63 - "Applicability of General Provisions to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) All of the emissions from this emissions unit shall be captured and directed to the RTO whenever the emissions unit is in operation.

[Authority for term:OAC rule 3745-77-07(A)(1)]

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

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

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

[Authority for term: OAC rule 3745-17-11(C)(2)(e) and OAC rule 3745-77-07(A)(1)]

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number for each coating and cleanup material employed;

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

c. the VOC content of each coating and cleanup material, in pounds per gallon;

d. the total VOC emissions, in tons;

e. the combined VOC emissions, in tons, from emissions units K062, K064, K065, and K067; and

f. the combined, rolling, 12-month VOC emissions, in tons, from emissions units K062, K064, K065, and K067.

[Authority for term:OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

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

a. the name and identification number of each coating used;

b. the mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

c. the maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily volume-weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of all of the coatings; and

d. the calculated, controlled VOC emission rate, in mass of VOC per unit volume of coating solids, as applied. The controlled VOC emission rate shall be calculated using (a) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with d)(2)c above and (b) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the source was in compliance.

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

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

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

(4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

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

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

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

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

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

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

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

(8) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within $\pm$ 1 percent of the temperature being measured or $\pm$ 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's

recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

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

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

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

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

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

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

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

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

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

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

(10) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(11) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports 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. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer’s recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

ii. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the emissions were not captured and directed to the RTO;

iii. each period of time (start time and date, and end time and date)when the average combustion temperature within the thermal oxidizer was outside

of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

iv. each incident of deviation described in "ii"or "iii" (above) where a prompt investigation was not conducted;

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

vi. each incident of deviation described in "ii"or "iii" where proper records were not maintained for the investigation and/or the corrective action(s); and

vii. each rolling, 12-month period during which the combined VOC emissions, from emissions units K062, K064, K065, and K067 exceeded 8.85 tons.

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

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

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

f) Testing Requirements

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

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

VOC emissions shall not exceed 0.50 lb/hr (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly VOC emissions limitation was established using the following equation:

VOC = (U*Vc)*(1-CE)

where:

VOC = maximum VOC emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

Vc = VOC content of coating (lb/gal)

CE = Overall control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates and multiple VOC contents.

b. Emissions Limitation:

PE shall not exceed 0.012 lb/hr and 0.05 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly PE limitation was established using the following equation:

PE = (U*D*S)*(1-TE)(1-CE)

where:

PE = maximum particulate emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

D = coating density (lb/gal)

S = solids content (percent weight)

TE = Transfer efficiency

CE = Control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates, multiple solids contents, and multiple coating densities.

The annual PE limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

c. Emissions Limitation:

The combined VOC emissions from emissions units K062, K064, K065, and K067 shall not exceed 8.85 tons per rolling, 12-month period.

Applicable Compliance Method:

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

d. Emissions Limitation:

VOC emissions shall not exceed 5.1 pounds per gallon of coating solids.

Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2) and the following equation:

E = [VOC/(M*S)]*[1-CE]

where:

E = maximum emissions (lb VOC/gallon of solid)

VOC = maximum total VOC emissions for all coatings and thinners (lb/hr)

M = maximum coating application rate (gal/hr)

S = Solids content (percent by volume)

CE = RTO control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple solids contents, multiple coating application rates and combined total VOC emissions.

e. Emission Limitation:

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

Compliance Method:

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart MMMM.

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

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

a. The emission testing shall be conducted within 6 months prior to the permit expiration;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;

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

Method 18, Method 25 or Method 25A of 40 CFRPart 60, Appendix A.

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

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

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test

methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartMMMM.

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

(6) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

g) Miscellaneous Requirements

(1) None.

9. K064, Upper Bracket/Mushrm

Operations, Property and/or Equipment Description:

Upper Bracket/(Mushroom) Adhesive Application Machine controlled with a permanent total enclosure (PTE) and regenerative thermal oxidizer (RTO).

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (P0107943)	Volatile organic compound (VOC) emissions shall not exceed 0.20pound per hour (lb/hr). Particulate emissions (PE) shall not exceed 0.005 lb/hr and 0.02 ton per year (TPY). See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (P0107943)	See b)(2)d.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD)	The combined VOC emissions from emissions units K062, K064, K065, and K067 shall not exceed 8.85 tons per rolling, 12-month period. VOC emissions from this emissions unit shall be reduced by an overall control efficiency of at least 97%. See c)(1)
d.	OAC rule 3745-17-11(C)	See c)(2), c)(3), and d)(3) through d)(7)
e.	OAC rule 3745-21-09(U)(1)(i)	VOC emissions shall not exceed 5.1 pounds per gallon of coating solids.
f.	40 CFR Part 63, Subpart MMMM (40 CFR Part 63.3880-3981)	See b)(2)e.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)f.

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

b. The hourly VOC limitation was established to reflect the potential to emit for this emissions unit, as vented to a thermal oxidizer. The monitoring, recordkeeping and testing requirements that ensure VOC emissions from this emissions unit are captured and directed to the thermal oxidizer are sufficient to ensure compliance with this limitation.

c. The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit, as vented to a particulate filter system. The monitoring, recordkeeping and testing requirements for the particulate filter system, as established in the following terms and conditions, are sufficient to ensure compliance with these limitations.

d. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

i. The Best Available Technology (BAT) requirements under OAC rule3745-31-05(A)(3) do not apply to the VOC emissions fromthis air contaminant source because the calculated annual emission rate for VOCis less than ten tons per year taking into account the federally enforceable operational restriction requiring that all emissions be directed to an RTO with an overall control efficiency of at least 97% established under OAC rule 3745-31-05(D).

ii. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE for this emissions unit because the uncontrolled potential to emit for PE is less than ten tons per year.

e. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:

i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are controlled a regenerative thermal oxidizer. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart MMMM, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.

f. Table 2 to subpart MMMM of 40 CFR Part 63 - "Applicability of General Provisions to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) All of the emissions from this emissions unit shall be captured and directed to the RTO whenever the emissions unit is in operation.

[Authority for term:OAC rule 3745-77-07(A)(1)]

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

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

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

[Authority for term: OAC rule 3745-17-11(C)(2)(e) and OAC rule 3745-77-07(A)(1)]

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number for each coating and cleanup material employed;

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

c. the VOC content of each coating and cleanup material, in pounds per gallon;

d. the total VOC emissions, in tons;

e. the combined VOC emissions, in tons, from emissions units K062, K064, K065, and K067; and

f. the combined, rolling, 12-month VOC emissions, in tons, from emissions units K062, K064, K065, and K067.

[Authority for term:OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

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

a. the name and identification number of each coating used;

b. the mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

c. the maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily volume-weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of all of the coatings; and

d. the calculated, controlled VOC emission rate, in mass of VOC per unit volume of coating solids, as applied. The controlled VOC emission rate shall be calculated using (a) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with d)(2)c above and (b) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the source was in compliance.

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

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

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

(4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

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

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

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

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

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

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

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

(8) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within $\pm$ 1 percent of the temperature being measured or $\pm$ 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's

recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

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

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

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

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

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

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

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

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

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

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

(10) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(11) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports 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. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

ii. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the emissions were not captured and directed to the RTO;

iii. each period of time (start time and date, and end time and date)when the average combustion temperature within the thermal oxidizer was outside

of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

iv. each incident of deviation described in "ii"or "iii" (above) where a prompt investigation was not conducted;

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

vi. each incident of deviation described in "ii"or "iii" where proper records were not maintained for the investigation and/or the corrective action(s); and

vii. each rolling, 12-month period during which the combined VOC emissions, from emissions units K062, K064, K065, and K067 exceeded 8.85 tons.

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

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

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

f) Testing Requirements

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

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

VOC emissions shall not exceed 0.20 lb/hr (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly VOC emissions limitation was established using the following equation:

VOC = (U*Vc)*(1-CE)

where:

VOC = maximum VOC emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

Vc = VOC content of coating (lb/gal)

CE = Overall control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates and multiple VOC contents.

b. Emissions Limitation:

PE shall not exceed 0.005 lb/hr and 0.02 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly PE limitation was established using the following equation:

PE = (U*D*S)*(1-TE)(1-CE)

where:

PE = maximum particulate emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

D = coating density (lb/gal)

S = solids content (percent weight)

TE = Transfer efficiency

CE = Control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates, multiple solids contents, and multiple coating densities.

The annual PE limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

c. Emissions Limitation:

The combined VOC emissions from emissions units K062, K064, K065, and K067 shall not exceed 8.85 tons per rolling, 12-month period.

Applicable Compliance Method:

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

d. Emissions Limitation:

VOC emissions shall not exceed 5.1 pounds per gallon of coating solids.

Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2) and the following equation:

E = [VOC/(M*S)]*[1-CE]

where:

E = maximum emissions (lb VOC/gallon of solid)

VOC = maximum total VOC emissions for all coatings and thinners (lb/hr)

M = maximum coating application rate (gal/hr)

S = Solids content (percent by volume)

CE = RTO control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple solids contents, multiple coating application rates and combined total VOC emissions.

e. Emission Limitation:

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

Compliance Method:

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart MMMM.

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

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

a. The emission testing shall be conducted within 6 months prior to the permit expiration;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;

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

Method 18, Method 25 or Method 25A of 40 CFRPart 60, Appendix A.

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

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

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test

methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartMMMM.

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

(6) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

g) Miscellaneous Requirements

(1) None.

10. K065, Flex A Inner Pipe

Operations, Property and/or Equipment Description:

Flex A Inner Pipe Spray Adhesive Application Machine controlled with a permanent total enclosure (PTE) and regenerative thermal oxidizer (RTO).

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (P0107943)	Volatile organic compound (VOC) emissions shall not exceed 0.15pound per hour (lb/hr). Particulate emissions (PE) shall not exceed 0.006 lb/hr and 0.03 ton per year (TPY). See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (P0107943)	See b)(2)d.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD)	The combined VOC emissions from emissions units K062, K064, K065, and K067 shall not exceed 8.85 tons per rolling, 12-month period. VOC emissions from this emissions unit shall be reduced by an overall control efficiency of at least 97%. See c)(1)
d.	OAC rule 3745-17-11(C)	See c)(2), c)(3), and d)(3) through d)(7)
e.	OAC rule 3745-21-09(U)(1)(i)	VOC emissions shall not exceed 5.1 pounds per gallon of coating solids.
f.	40 CFR Part 63, Subpart MMMM (40 CFR Part 63.3880-3981)	See b)(2)e.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)f.

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

b. The hourly VOC limitation was established to reflect the potential to emit for this emissions unit, as vented to a thermal oxidizer. The monitoring, recordkeeping and testing requirements that ensure VOC emissions from this emissions unit are captured and directed to the thermal oxidizer are sufficient to ensure compliance with this limitation.

c. The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit, as vented to a particulate filter system. The monitoring, recordkeeping and testing requirements for the particulate filter system, as established in the following terms and conditions, are sufficient to ensure compliance with these limitations.

d. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

i. The Best Available Technology (BAT) requirements under OAC rule3745-31-05(A)(3) do not apply to the VOC emissions fromthis air contaminant source because the calculated annual emission rate for VOCis less than ten tons per year taking into account the federally enforceable operational restriction requiring that all emissions be directed to an RTO with an overall control efficiency of at least 97% established under OAC rule 3745-31-05(D).

ii. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE for this emissions unit because the uncontrolled potential to emit for PE is less than ten tons per year.

e. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:

i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are controlled a regenerative thermal oxidizer. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart MMMM, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.

f. Table 2 to subpart MMMM of 40 CFR Part 63 - "Applicability of General Provisions to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) All of the emissions from this emissions unit shall be captured and directed to the RTO whenever the emissions unit is in operation.

[Authority for term:OAC rule 3745-77-07(A)(1)]

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

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

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

[Authority for term: OAC rule 3745-17-11(C)(2)(e) and OAC rule 3745-77-07(A)(1)]

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number for each coating and cleanup material employed;

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

c. the VOC content of each coating and cleanup material, in pounds per gallon;

d. the total VOC emissions, in tons;

e. the combined VOC emissions, in tons, from emissions units K062, K064, K065, and K067; and

f. the combined, rolling, 12-month VOC emissions, in tons, from emissions units K062, K064, K065, and K067.

[Authority for term:OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

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

a. the name and identification number of each coating used;

b. the mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

c. the maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily volume-weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of all of the coatings; and

d. the calculated, controlled VOC emission rate, in mass of VOC per unit volume of coating solids, as applied. The controlled VOC emission rate shall be calculated using (a) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with d)(2)c above and (b) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the source was in compliance.

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

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

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

(4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

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

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

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

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

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

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

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

(8) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within $\pm$ 1 percent of the temperature being measured or $\pm$ 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's

recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

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

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

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

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

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

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

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

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

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

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

(10) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(11) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports 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. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

ii. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the emissions were not captured and directed to the RTO;

iii. each period of time (start time and date, and end time and date)when the average combustion temperature within the thermal oxidizer was outside

of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

iv. each incident of deviation described in "ii"or "iii" (above) where a prompt investigation was not conducted;

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

vi. each incident of deviation described in "ii"or "iii" where proper records were not maintained for the investigation and/or the corrective action(s); and

vii. each rolling, 12-month period during which the combined VOC emissions, from emissions units K062, K064, K065, and K067 exceeded 8.85 tons.

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

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

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

f) Testing Requirements

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

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

VOC emissions shall not exceed 0.15 lb/hr (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly VOC emissions limitation was established using the following equation:

VOC = (U*Vc)*(1-CE)

where:

VOC = maximum VOC emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

Vc = VOC content of coating (lb/gal)

CE = Overall control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates and multiple VOC contents.

b. Emissions Limitation:

PE shall not exceed 0.006 lb/hr and 0.03 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly PE limitation was established using the following equation:

PE = (U*D*S)*(1-TE)(1-CE)

where:

PE = maximum particulate emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

D = coating density (lb/gal)

S = solids content (percent weight)

TE = Transfer efficiency

CE = Control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates, multiple solids contents, and multiple coating densities.

The annual PE limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

c. Emissions Limitation:

The combined VOC emissions from emissions units K062, K064, K065, and K067 shall not exceed 8.85 tons per rolling, 12-month period.

Applicable Compliance Method:

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

d. Emissions Limitation:

VOC emissions shall not exceed 5.1 pounds per gallon of coating solids.

Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2) and the following equation:

E = [VOC/(M*S)]*[1-CE]

where:

E = maximum emissions (lb VOC/gallon of solid)

VOC = maximum total VOC emissions for all coatings and thinners (lb/hr)

M = maximum coating application rate (gal/hr)

S = Solids content (percent by volume)

CE = RTO control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple solids contents, multiple coating application rates and combined total VOC emissions.

e. Emission Limitation:

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

Compliance Method:

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart MMMM.

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

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

a. The emission testing shall be conducted within 6 months prior to the permit expiration;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;

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

Method 18, Method 25 or Method 25A of 40 CFRPart 60, Appendix A.

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

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

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test

methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartMMMM.

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

(6) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

g) Miscellaneous Requirements

(1) None.

11. K067, Stopper Bracket

Operations, Property and/or Equipment Description:

Stopper Bracket/Heavy Weight Adhesive Application Machine controlled with a permanent total enclosure (PTE) and regenerative thermal oxidizer (RTO).

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (P0107943)	Volatile organic compound (VOC) emissions shall not exceed 1.17pounds per hour (lbs/hr). Particulate emissions (PE) shall not exceed 0.028 lb/hr and 0.12 ton per year (TPY). See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (P0107943)	See b)(2)d.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD)	The combined VOC emissions from emissions units K062, K064, K065, and K067 shall not exceed 8.85 tons per rolling, 12-month period. VOC emissions from this emissions unit shall be reduced by an overall control efficiency of at least 97%. See c)(1)
d.	OAC rule 3745-17-11(C)	See c)(2), c)(3), and d)(3) through d)(7)
e.	OAC rule 3745-21-09(U)(1)(i)	VOC emissions shall not exceed 5.1 pounds per gallon of coating solids.
f.	40 CFR Part 63, Subpart MMMM (40 CFR Part 63.3880-3981)	See b)(2)e.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)f.

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

b. The hourly VOC limitation was established to reflect the potential to emit for this emissions unit, as vented to a thermal oxidizer. The monitoring, recordkeeping and testing requirements that ensure VOC emissions from this emissions unit are captured and directed to the thermal oxidizer are sufficient to ensure compliance with this limitation.

c. The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit, as vented to a particulate filter system. The monitoring, recordkeeping and testing requirements for the particulate filter system, as established in the following terms and conditions, are sufficient to ensure compliance with these limitations.

d. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

i. The Best Available Technology (BAT) requirements under OAC rule3745-31-05(A)(3) do not apply to the VOC emissions fromthis air contaminant source because the calculated annual emission rate for VOCis less than ten tons per year taking into account the federally enforceable operational restriction requiring that all emissions be directed to an RTO with an overall control efficiency of at least 97% established under OAC rule 3745-31-05(D).

ii. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE for this emissions unit because the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule requirements associated with the particulate filter system established under OAC rule 3745-17-11(C).

e. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:

i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are controlled a regenerative thermal oxidizer. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart MMMM, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.

f. Table 2 to subpart MMMM of 40 CFR Part 63 - "Applicability of General Provisions to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) All of the emissions from this emissions unit shall be captured and directed to the RTO whenever the emissions unit is in operation.

[Authority for term:OAC rule 3745-77-07(A)(1)]

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

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

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

[Authority for term: OAC rule 3745-17-11(C)(2)(e) and OAC rule 3745-77-07(A)(1)]

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number for each coating and cleanup material employed;

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

c. the VOC content of each coating and cleanup material, in pounds per gallon;

d. the total VOC emissions, in tons;

e. the combined VOC emissions, in tons, from emissions units K062, K064, K065, and K067; and

f. the combined, rolling, 12-month VOC emissions, in tons, from emissions units K062, K064, K065, and K067.

[Authority for term:OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

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

a. the name and identification number of each coating used;

b. the mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

c. the maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily volume-weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of all of the coatings; and

d. the calculated, controlled VOC emission rate, in mass of VOC per unit volume of coating solids, as applied. The controlled VOC emission rate shall be calculated using (a) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with d)(2)c above and (b) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the source was in compliance.

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

(3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be

maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

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

(4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

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

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

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

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

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

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

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

(8) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of

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

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

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

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

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

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

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

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

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

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

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

(10) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(11) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports 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. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

ii. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the emissions were not captured and directed to the RTO;

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

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

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

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

vii. each rolling, 12-month period during which the combined VOC emissions, from emissions units K062, K064, K065, and K067 exceeded 8.85 tons.

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

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

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

f) Testing Requirements

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

a. Emissions Limitation:

VOC emissions shall not exceed 1.17 lb/hr (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly VOC emissions limitation was established using the following equation:

VOC = (U*Vc)*(1-CE)

where:

VOC = maximum VOC emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

Vc = VOC content of coating (lb/gal)

CE = Overall control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates and multiple VOC contents.

b. Emissions Limitation:

PE shall not exceed 0.028 lb/hr and 0.12 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly PE limitation was established using the following equation:

PE = (U*D*S)*(1-TE)(1-CE)

where:

PE = maximum particulate emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

D = coating density (lb/gal)

S = solids content (percent weight)

TE = Transfer efficiency

CE = Control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates, multiple solids contents, and multiple coating densities.

The annual PE limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

c. Emissions Limitation:

The combined VOC emissions from emissions units K062, K064, K065, and K067 shall not exceed 8.85 tons per rolling, 12-month period.

Applicable Compliance Method:

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

d. Emissions Limitation:

VOC emissions shall not exceed 5.1 pounds per gallon of coating solids.

Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2) and the following equation:

E = [VOC/(M*S)]*[1-CE]

where:

E = maximum emissions (lb VOC/gallon of solid)

VOC = maximum total VOC emissions for all coatings and thinners (lb/hr)

M = maximum coating application rate (gal/hr)

S = Solids content (percent by volume)

CE = RTO control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple solids contents, multiple coating application rates and combined total VOC emissions.

e. Emission Limitation:

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

Compliance Method:

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart MMMM.

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

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

a. The emission testing shall be conducted within 6 months prior to the permit expiration;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;

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

Method 18, Method 25 or Method 25A of 40 CFRPart 60, Appendix A.

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

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

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the

applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartMMMM.

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

(6) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

g) Miscellaneous Requirements

(1) None.

12. K068, Tumble Spray Machine

Operations, Property and/or Equipment Description:

Tumble Spray Machine controlled with a permanent total enclosure (PTE) and regenerative thermal oxidizer (RTO).

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	VOC emissions from the coating operation shall not exceed 0.37pound per hour (lb/hr). Particulate emissions from the coating operation shall not exceed 0.01 lb/hr and 0.04 ton per year (TPY). Emissions from the combustion of natural gas in the RTO shall not exceed the following: PE shall not exceed 0.06 lb/hr and 0.26 TPY; Carbon monoxide (CO) emissions shall not exceed 0.70 lb/hr and 3.07 TPY; Sulfur dioxide (SO_2) emissions shall not exceed 0.005 lb/hr and 0.02 TPY; Nitrogen oxide (NO_X) emissions shall not exceed 0.83 lb/hr and 3.64 TPY; and Organic compound (OC) emissions shall not exceed 0.04 lb/hr and 0.18 TPY.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a., b(2)b., b)(2)c., and b)(2)d.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (P0110932)	See b(2)e.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD)	The volatile organic compounds (VOC) emissions from emissions unit K068 shall not exceed 1.64 tons per rolling, 12-month period. See c)(1) and c)(2)
d.	OAC rule 3745-17-11(C)	See b)(2)f. and c)(3)
e.	OAC rule 3745-21-09(U)(1)	See b)(2)g.
f.	40 CFR Part 63, Subpart MMMM (40 CFR Part 63.3880-3981)	See b)(2)h.
g.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)i.

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

b. The hourly VOC emissions limitation was established to reflect the potential to emit for this emissions unit taking into consideration the capture and control requirements established under OAC rule 3745-31-05(D) for the control of VOC emissions. The monitoring, recordkeeping, reporting, and testing requirements for the VOC capture and control system as established in the following terms and conditions are sufficient to demonstrate compliance with this limitation.

c. The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. It is not necessary to establish monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

d. The PE, CO, SO_2, NO_X and OC emissions limitations were established to reflect the potential-to-emit for each pollutant related to the combustion of natural gas in the RTO. It is not necessary to establish monitoring and recordkeeping or reporting requirements to ensure compliance with these limitations.

e. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to the particulate emissions (PE), carbon monoxide (CO), sulfur dioxide (SO_2), nitrogen oxides (NOx) and OC emissions related to the combustion of natural gas in the RTO serving this emissions unitbecause the potential to emit for each of these pollutants is less than ten TPY;

ii. The BAT requirements under OAC rule 3745-31-05 (A)(3) do not apply to the PE from this air contaminant source because the uncontrolled potential to emit for PE is less than ten TPY; and

iii. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the controlled potential to emit for VOC is less than 10 TPY taking into consideration the federally enforceable limitations on the potential to emit established under OAC rule 3745-31-05(D).

f. Pursuant to OAC rule 3745-17-11(A)(1)(i), the requirements of OAC rule 3745-17-11(C) do not apply to this emissions unit if the surface coating process uses less than five gallons of coatings per day and the permittee maintains coating usage records, coating purchase records, and/or production records that clearly demonstrate the actual coating usage is less than five gallons per day.

g. Pursuant to OAC rule 3745-21-09(U)(2)(e)(iii), the limitations identified in OAC rule 3745-21-09(U)(1) do not apply to a coating line that never uses more than ten gallons per day of coating.

h. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:

i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are controlled by two thermal oxidizers. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must

demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart MMMM, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.

i. Table 2 to subpart MMMM of 40 CFR Part 63 - "Applicability of General Provisions to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) All of the VOC emissions from this emissions unit shall be vented to an RTO with a minimum overall control efficiency of 95%.

[Authority for term:OAC rule 3745-77-07(A)(1)]

(2) The permittee shall employ a permanent total enclosure (PTE) to ensure that all VOC emissions are captured, contained, and directed to the control device. The PTE shall be maintained in accordance with 40 CFR Part 63, subpart MMMM.

[Authority for term:OAC rule 3745-77-07(A)(1)]

(3) The permittee shall not use more than 5 gallons of coating material per day in this surface coating process.

[Authority for term: OAC rule 3745-17-11(A)(1)(i) and OAC rule 3745-77-07(A)(1)]

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

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 volume, in gallons, of each coating employed; and

c. the total volume, in gallons, of all coatings employed.

[Authority for term: OAC rule 3745-17-11(A)(1) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number for each coating and cleanup material employed;

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

c. the VOC content of each coating and cleanup material, in pounds per gallon;

d. the total VOC emissions, in tons;

e. the rolling, 12-month VOC emissions, in tons.

[Authority for term:OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

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

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

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

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

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

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

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

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

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

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

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

(5) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(6) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports 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. each period of time during which all VOC emissions from this emissions were not vented to an RTO with a minimum overall control efficiency of 95%;

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

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

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

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

vi. each rolling, 12-month period during which the VOC emissions, from emissions unit K068 exceeded 1.64 tons.

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

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

(3) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than 5 gallons per day. The notification shall include a copy of such record and shall be sent to the

appropriate District Office or local air agency within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-17-11(A)(1) and OAC rule 3745-77-07(C)(1)]

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

f) Testing Requirements

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

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

VOC emissions from the coating operation shall not exceed 0.37 lb/hr (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

<u>Applicable Compliance Method:</u>

The hourly VOC emissions limitation was established using the following equation:

VOC = (U*Vc)*(1-CE)

where:

VOC = maximum VOC emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

Vc = VOC content of coating (lb/gal)

CE = Overall control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates and multiple VOC contents.

b. Emissions Limitations:

PE from the coating operation shall not exceed 0.01 lb/hr and 0.04 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly PE limitation was established using the following equation:

PE = (U*D*S)*(1-TE)(1-CE)

where:

PE = maximum particulate emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

D = coating density (lb/gal)

S = solids content (percent weight)

TE = Transfer efficiency

CE = Control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates, multiple solids contents, and multiple coating densities.

The annual PE limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

c. Emissions Limitations:

Emissions from the combustion of natural gas in the RTO shall not exceed the following (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP):

PE = 0.06 lb/hr and 0.26 TPY;
CO = 0.70 lb/hr and 3.07 TPY;
SO_2 = 0.005 lb/hr and 0.02 TPY;
NO_X = 0.83 lb/hr and 3.64 TPY; and
OC = 0.04 lb/hr and 0.18 TPY.

Applicable Compliance Method:

The hourly limitations were established by multiplying the maximum heat input rating of the RTO burner (8.5 MMBtu) by the following emissions factors:

Pollutant	Emissions Factor*
PE	0.007 lbs/MMBtu
CO	0.082lbs/MMBtu
SO_2	0.0006lbs/MMBtu
NO_X	0.098lbs/MMBtu
OC	0.005lbs/MMBtu

*AP-42, Volume I, Fifth Edition, Section 1.4, "Natural Gas Combustion", Table 1.4-1 and 1.4-2, July 1998.

The annual limitations were established by multiplying the hourly limitations by the maximum operating hours in a year (8,760) and then dividing by 2,000.

d. Emissions Limitation:

The VOC emissions from emissions units K068 shall not exceed 1.64 tons per rolling, 12-month period.

Applicable Compliance Method:

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

e. Emission Limitation:

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

Compliance Method:

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart MMMM.

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

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

a. The emission testing shall be conducted within 6 months prior to the permit expiration;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;

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

Method 18, Method 25 or Method 25A of 40 CFRPart 60, Appendix A.

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

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

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartMMMM.

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

(6) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

g) Miscellaneous Requirements

(1) None.

13. K070, Resin Line #5

Operations, Property and/or Equipment Description:

Resin Line #5 Coating Machine

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) b)(1)e., d)(2) through d)(5), and e)(2)a.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001 (P0110932)	Particulate emissions (PE) shall not exceed 0.14 pound per hour (lb/hr) and 0.61 ton per year (TPY). See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006 (P0110932)	See b)(2)c.
c.	ORC 3704.03(T) (P0110932)	Organic compound (OC) emissions shall not exceed 11.55 tons per rolling, 12-month period, including emissions from pre-wash, coating, and cleanup material usage.
d.	OAC rule 3745-17-11(C)	See b)(2)d. and c)(1)
e.	ORC 3704.03(F)(3)(c)	See d)(2) through d)(5) and e)(2)a.

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-

approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

b. The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. It is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

c. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source because the uncontrolled potential to emit for PE is less than 10 TPY.

d. Pursuant to OAC rule 3745-17-11(A)(1)(i), the requirements of OAC rule 3745-17-11(C) do not apply to this emissions unit if the surface coating process uses less than five gallons of coatings per day and the permittee maintains coating usage records, coating purchase records, and/or production records that clearly demonstrate the actual coating usage is less than five gallons per day.

c) Operational Restrictions

(1) The permittee shall not use more than 5 gallons of coating material per day in this surface coating process.

[Authority for term: OAC rule 3745-17-11(A)(1)(i) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

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

a. the company identification for each coating, cleanup material, and pre-wash material employed;

b. the number of gallons of each coating, cleanup material, and pre-wash material employed;

c. the organic compound content of each coating, cleanup material, and pre-wash material, in pounds per gallon;

d. the total monthly OC emissions from all coating, cleanup material, and pre-wash material used; and

e. the rolling, 12-month OC emissions from the emissions unit.

[Authority for term: OAC rule 3745-17-11(A)(1) and OAC rule 3745-77-07(C)(1)]

(2) Emissions unit K070 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:

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., "24" hours per day and "7" 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):

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

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

   Toxic Contaminant: Toluene

   TLV (mg/m3): 75.36

   Maximum Hourly Emission Rate (lbs/hr): 2.64

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 26.64

   MAGLC (ug/m3): 1,794

The permittee, has demonstrated that emissions of Toluene, from emissions unit(s) K070, 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).

[Authority for term: ORC 3704.03(F)(3)(c), ORC 3704.03(F)(4) and OAC rule 3745-114-01]

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

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

[Authority for term: ORC 3704.03(F)(3)(c), ORC 3704.03(F)(4) and OAC rule 3745-114-01]

(4) 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.

[Authority for term: ORC 3704.03(F)(3)(c), ORC 3704.03(F)(4) and OAC rule 3745-114-01]

(5) 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.

[Authority for term: ORC 3704.03(F)(3)(c), ORC 3704.03(F)(4) and OAC rule 3745-114-01]

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

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

a. 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; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.

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

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

(3) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than 5 gallons per day. The notification shall include a copy of such record and shall be sent to the appropriate District Office or local air agency within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-17-11(A)(1) and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emissions Limitations:

PE shall not exceed 0.14 lb/hr and 0.61 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly PE limitation was established using the following equation:

PE = (U*D*S)*(1-TE)

where:

PE = maximum particulate emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

D = coating density (lb/gal)

S = solids content (percent weight)

TE = Transfer efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates, multiple solids contents, and multiple coating densities.

The annual PE limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

b. Emissions Limitation:

OC emissions shall not exceed 11.55 tons per rolling, 12-month period, including emissions from pre-wash, coating, and cleanup material usage.

Applicable Compliance Method:

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

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

g) Miscellaneous Requirements

(1) None.

14. P305, 5100-OUTP-04

Operations, Property and/or Equipment Description:

chain on edge machine (adhesive/primer application), vented to a regenerative thermal oxidizer (RTO)

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) b)(1)f. and d)(10)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001 (P0107944)	Volatile organic compound (VOC) emissions shall not exceed 0.26 pound per hour (lb/hr), excluding cleanup materials Particulate emissions (PE) shall not exceed 0.056 lb/hr and 0.25 ton per year (TPY). See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006 (P0107944)	See b)(2)d.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD)	VOC emissions shall not exceed 1.16 tons per rolling, 12-month period, including cleanup materials. VOC emissions from this emissions unit shall be reduced by an overall control efficiency of at least 97%. See c)(1)
d.	OAC rule 3745-17-11(C)	See c)(2), c)(3), and d)(3) through d)(7)
e.	OAC rule 3745-21-09(U)(1)(i)	VOC emissions shall not exceed 5.1 pounds per gallon of coating solids.
f.	ORC 3704.03(F)(3)(c)	See d)(10)
g.	40 CFR Part 63, Subpart MMMM (40	See b)(2)e.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	CFR Part 63.3880-3981)	
h.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)f.

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

b. The hourly VOC emissions limitations was established to reflect the potential to emit for this emissions unit taking into consideration the capture and control requirements established under OAC rule 3745-31-05(D) for the control of VOC emissions. The monitoring, recordkeeping, reporting, and testing requirements for the VOC capture and control system as established in the following terms and conditions are sufficient to demonstrate compliance with this limitation.

c. The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit taking into consideration the requirements established under OAC rule 3745-17-11(C) for the control of particulate emissions. The monitoring, recordkeeping, reporting, and testing requirements for the dry particulate filter system as established in the following terms and conditions are sufficient to demonstrate compliance with these limitations.

d. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source because the uncontrolled potential to emit for PE is less than 10 TPY; and

ii. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the controlled potential to emit for VOC is less than 10 TPY taking into consideration the federally enforceable limitations on the potential to emit established under OAC rule 3745-31-05(D).

e. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:

i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are controlled by two thermal oxidizers. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart MMMM, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.

f. Table 2 to subpart MMMM of 40 CFR Part 63 - "Applicability of General Provisions to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) All of the emissions from this emissions unit shall be captured and directed to the RTO whenever the emissions unit is in operation.

[Authority for term:OAC rule 3745-77-07(A)(1)]

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

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

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

[Authority for term: OAC rule 3745-17-11(C)(2)(e) and OAC rule 3745-77-07(A)(1)]

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number for each coating and cleanup material employed;

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

c. the VOC content of each coating and cleanup material, in pounds per gallon;

d. the total monthly VOC emissions, in tons; and

e. the rolling, 12-month VOC emissions, in tons.

[Authority for term:OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

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

a. the name and identification number of each coating used;

b. the mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

c. the maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily volume-weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of all of the coatings; and

d. The calculated, controlled VOC emission rate, in mass of VOC per unit volume of coating solids, as applied. The controlled VOC emission rate shall be calculated using (a) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with d)(2)c above and (b) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the source was in compliance.

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

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

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

(4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

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

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

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

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

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

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

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

(8) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within $\pm$ 1 percent of the temperature being measured or $\pm$ 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's

recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

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

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

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

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

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

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

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

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

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

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

(10) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

[Authority for term:ORC 3704.03(F)(3)(c) and OAC rule 3745-77-07(C)(1)]

(11) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(12) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports 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. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

ii. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the emissions were not captured and directed to the RTO;

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

iv. each incident of deviation described in "ii"or "iii" (above) where a prompt investigation was not conducted;

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

vi. each incident of deviation described in "ii"or "iii" where proper records were not maintained for the investigation and/or the corrective action(s); and

vii. each rolling, 12-month period during which the total VOC emissions from this emissions unit exceeded 1.16 tons.

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

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

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

f) Testing Requirements

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

a. Emissions Limitation:

VOC emissions shall not exceed 0.26 lb/hr, excluding cleanup materials (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly VOC emissions limitation was established using the following equation:

VOC = (U*Vc)*(1-CE)

where:

VOC = maximum VOC emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

Vc = VOC content of coating (lb/gal)

CE = Overall control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates and multiple VOC contents.

b. Emissions Limitations:

PE shall not exceed 0.056 lb/hr and 0.25 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly PE limitation was established using the following equation:

PE = (U*D*S)*(1-TE)(1-CE)

where:

PE = maximum particulate emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

D = coating density (lb/gal)

S = solids content (percent weight)

TE = Transfer efficiency

CE = Control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates, multiple solids contents, and multiple coating densities.

The annual PE limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

c. Emissions Limitation:

VOC emissions shall not exceed 1.16 tons per rolling, 12-month period.

Applicable Compliance Method:

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

d. Emissions Limitation:

VOC emissions shall not exceed 5.1 pounds per gallon of coating solids.

Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2) and the following equation:

E = [VOC/(M*S)]*[1-CE]

where:

E = maximum emissions (lb VOC/gallon of solid)

VOC = maximum total VOC emissions for all coatings and thinners (lb/hr)

M = maximum coating application rate (gal/hr)

S = Solids content (percent by volume)

CE = RTO control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple solids contents, multiple coating application rates and combined total VOC emissions.

e. Emission Limitation:

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

Compliance Method:

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart MMMM.

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

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

a. The emission testing shall be conducted within 6 months prior to the permit expiration;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;

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

Method 18, Method 25 or Method 25A of 40 CFRPart 60, Appendix A.

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

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

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartMMMM.

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

(6) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

g) Miscellaneous Requirements

(1) None.

15. Emissions Unit Group -A GroupApplication Machines: K009,K010,K011,K012,

EU ID	Operations, Property and/or Equipment Description
K009	Outer Pipe Machine A
K010	Inner Pipe Machine A
K011	Inner Pipe Machine B
K012	Outer Pipe Machine B

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (P0110932)	Volatile organic compound (VOC) emissions shall not exceed 0.298 pound per hour (lb/hr) and 1.31 tons per year (TPY). See b)(2)a.
b.	OAC rule 3745-21-09(B)(6) [in lieu of OAC rule 3745-21-09(U)(1)]	See b)(2)b.
c.	OAC rule 3745-17-11(C)	See c)(1), c)(2), and d)(2) through d)(6)
d.	40 CFR Part 63, Subpart MMMM (40 CFR Part 63.3880-3981)	See b)(2)c.
e.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)d.

(2) Additional Terms and Conditions

a. The permittee shall control VOC emissions from this emissions unit through the use of a permanent total enclosure (PTE) and a thermal incinerator with a minimum overall control efficiency of 95%.

b. The 81% overall control efficiency requirement and 90% VOC destruction removal efficiency requirements established by OAC rule 3745-21-06(B) are less stringent than the capture and overall control efficiency requirements established pursuant to OAC rule 3745-31-05(A)(3). The monitoring, recordkeeping, reporting, and testing requirements for the VOC capture and control system as established in the following terms and conditions are sufficient to demonstrate

compliance with OAC rule 3745-21-09(B)(6). Additional monitoring and recordkeeping requirements have been established pursuant to OAC rule 3745-21-09(B)(3)(l).

c. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:

i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are controlled by two thermal oxidizers. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart MMMM, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.

d. Table 2 to subpart MMMM of 40 CFR Part 63 - "Applicability of General Provisions to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

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

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

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

[Authority for term: OAC rule 3745-17-11(C)(2)(e) and OAC rule 3745-77-07(A)(1)]

(3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

d) Monitoring and/or Recordkeeping Requirements

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

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 number of gallons of each coating employed;

d. the uncontrolled VOC emissions from all coatings applied, i.e., the summation of the products of “b” x “c”;

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

f. the total controlled VOC emissions from all coatings applied, i.e., “d” x (1 - “e”);

g. the name and identification of each cleanup material employed;

h. the VOC content of each cleanup material, in pounds per gallon;

i. the number of gallons of each cleanup material employed;

j. the total VOC emissions from all cleanup materials employed, i.e., the summation of the products of “h” x “i”, in pounds; and

k. the total VOC emissions from all coatings and cleanup materials employed during the day, i.e.,“f” + “j”, in pounds.

l. the total number of hours the emissions unit was operated; and

m. the average hourly controlled VOC emissions rate, in pounds per hour, i.e., “k” divided by “l”.

[Authority for term:OAC rule 3745-21-09(B)(6) and OAC rule 3745-77-07(C)(1)]

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

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

(3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

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

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

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

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

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

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

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

(7) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(8) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports 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. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

ii. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the emissions were not captured and directed to the RTO;

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

iv. each incident of deviation described in "ii"or "iii" (above) where a prompt investigation was not conducted;

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

vi. each incident of deviation described in "ii"or "iii" where proper records were not maintained for the investigation and/or the corrective action(s).

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

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

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

f) Testing Requirements

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

a. Emissions Limitations:

VOC emissions shall not exceed 0.298 lb/hr and 1.31 TPY.

Applicable Compliance Method:

Compliance with the hourly VOC emissions limitation shall be based upon the record keeping specified in d)(1).

The annual VOC limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

b. Emission Limitation:

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

Compliance Method:

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart MMMM.

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

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

a. The emission testing shall be conducted within 6 months prior to the permit expiration;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;

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

Method 18, Method 25 or Method 25A of 40 CFRPart 60, Appendix A.

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

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

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartMMMM.

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

(6) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

g) Miscellaneous Requirements

(1) None.

16. Emissions Unit Group -B GroupApplication Machines: K017,K018,

EU ID	Operations, Property and/or Equipment Description
K017	Small Parts Manual Spray Booth No.1 controlled with a permanent total enclosure (PTE) and regenerative thermal oxidizer (RTO).
K018	Small Parts Manual Spray Booth No.2 controlled with a permanent total enclosure (PTE) and regenerative thermal oxidizer (RTO).

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (P0110932)	Volatile organic compound (VOC) emissions shall not exceed 0.14 pound per hour (lb/hr) and 0.61 tons per year (TPY). See b)(2)a.
b.	OAC rule 3745-21-09(B)(6) [in lieu of OAC rule 3745-21-09(U)(1)]	See b)(2)b.
c.	OAC rule 3745-17-11(C)	See c)(1), c)(2), and d)(2) through d)(6)
d.	40 CFR Part 63, Subpart MMMM (40 CFR Part 63.3880-3981)	See b)(2)c.
e.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)d.

(2) Additional Terms and Conditions

a. The permittee shall control VOC emissions from this emissions unit through the use of a permanent total enclosure (PTE) and a thermal incinerator with a minimum overall control efficiency of 95%.

b. The 81% overall control efficiency requirement and 90% VOC destruction removal efficiency requirements established by OAC rule 3745-21-06(B) are less stringent than the capture and overall control efficiency requirements established pursuant to OAC rule 3745-31-05(A)(3). The monitoring, recordkeeping, reporting, and testing requirements for the VOC capture and control system as established in the following terms and conditions are sufficient to demonstrate

compliance with OAC rule 3745-21-09(B)(6). Additional monitoring and recordkeeping requirements have been established pursuant to OAC rule 3745-21-09(B)(3)(l).

c. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:

i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are controlled by two thermal oxidizers. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart MMMM, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.

d. Table 2 to subpart MMMM of 40 CFR Part 63 - "Applicability of General Provisions to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

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

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

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

[Authority for term: OAC rule 3745-17-11(C)(2)(e) and OAC rule 3745-77-07(A)(1)]

(3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

d) Monitoring and/or Recordkeeping Requirements

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

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 number of gallons of each coating employed;

d. the uncontrolled VOC emissions from all coatings applied, i.e., the summation of the products of “b” x “c”;

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

f. the total controlled VOC emissions from all coatings applied, i.e., “d” x (1 - “e”);

g. the name and identification of each cleanup material employed;

h. the VOC content of each cleanup material, in pounds per gallon;

i. the number of gallons of each cleanup material employed;

j. the total VOC emissions from all cleanup materials employed, i.e., the summation of the products of “h” x “i”, in pounds; and

k. the total VOC emissions from all coatings and cleanup materials employed during the day, i.e.,“f” + “j”, in pounds.

l. the total number of hours the emissions unit was operated; and

m. the average hourly controlled VOC emissions rate, in pounds per hour, i.e., “k” divided by “l”.

[Authority for term:OAC rule 3745-21-09(B)(6) and OAC rule 3745-77-07(C)(1)]

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

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

(3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

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

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

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

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

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

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

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

(7) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(8) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports 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. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

ii. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the emissions were not captured and directed to the RTO;

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

iv. each incident of deviation described in "ii"or "iii" (above) where a prompt investigation was not conducted;

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

vi. each incident of deviation described in "ii"or "iii" where proper records were not maintained for the investigation and/or the corrective action(s).

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

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

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

f) Testing Requirements

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

a. <u>Emissions Limitations:</u>

VOC emissions shall not exceed 0.14 lb/hr and 0.61 TPY.

<u>Applicable Compliance Method:</u>

Compliance with the hourly VOC emissions limitation shall be based upon the record keeping specified in d)(1).

The annual VOC limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

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

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

<u>Compliance Method:</u>

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart MMMM.

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

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

a. The emission testing shall be conducted within 6 months prior to the permit expiration;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;

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

Method 18, Method 25 or Method 25A of 40 CFRPart 60, Appendix A.

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

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

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartMMMM.

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

(6) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

g) Miscellaneous Requirements

(1) None.

17. Emissions Unit Group -C GroupApplication Machines: K032,K033,

EU ID	Operations, Property and/or Equipment Description
K032	Inner Pipe Brush Adhesive Machine No.1.
K033	Inner Pipe Brush Adhesive Machine No.2.

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

(1) b)(1)d. and d)(3)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 1.33pounds per hour (lbs/hr) and 5.82 tons per year (TPY), excluding cleanup materials. See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (P0110932)	See b)(2)c.
c.	OAC rule 3745-21-09(U)(1)	See b)(2)d. and c)(1)
d.	ORC 3704.03(F)(3)(c)	See d)(3)
e.	40 CFR Part 63, Subpart MMMM (40 CFR Part 63.3880-3981)	See b)(2)e.
f.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)f.

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP).

Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

b. The hourly and annual VOC limitations were established to reflect the potential to emit for this emissions unit, as vented to a thermal oxidizer. The monitoring, recordkeeping and testing requirements that ensure VOC emissions from this emissions unit are captured and directed to the thermal oxidizer are sufficient to ensure compliance with these limitations.

c. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

i. The permittee has accepted the following voluntary restrictions for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

(a) Volatile organic compound (VOC) emissions shall not exceed 5.82 tons per year (TPY), including cleanup materials.

d. Pursuant to OAC rule 3745-21-09(U)(2)(e)(iii), the limitations identified in OAC rule 3745-21-09(U)(1) do not apply to a coating line that never uses more than ten gallons per day of coating.

e. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:

i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are controlled by two thermal oxidizers. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart MMMM, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.

f. Table 2 to subpart MMMM of 40 CFR Part 63 - "Applicability of General Provisions to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

[Authority for term: OAC rule 3745-21-09(U)(2)(e)(iii) and OAC rule 3745-77-07(A)(1)]

(2) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

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 volume, in gallons, of each coating employed; and

c. the total volume, in gallons, of all coatings employed.

[Authority for term: OAC rule 3745-21-09(U) and OAC rule 3745-77-07(C)(1)]

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

a. the name and company identification for each coating employed;

b. the number of gallons of each coating employed;

c. the VOC content of each coating, in pounds per gallon;

d. the annual VOC emission rate for all coatings, in tons per year;

e. the name and company identification for each cleanup material employed;

f. the number of gallons of each cleanup material employed, excluding the number of gallons of clean up material recovered;

g. the VOC content of each cleanup material, in pounds per gallon;

h. the total VOC emission rate for all cleanup materials, in tons per year; and

i. the total VOC emissions from all coatings and cleanup materials, in tons per year.

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

(3) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

[Authority for term:ORC 3704.03(F)(3)(c) and OAC rule 3745-77-07(C)(1)]

(4) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(5) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than 10 gallons per day. The notification shall include a copy of such record and shall be sent to the appropriate District Office or local air agency within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-21-09(U) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

f) Testing Requirements

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

a. Emissions Limitations:

VOC emissions shall not exceed 1.33 lb/hr and 5.82 TPY, excluding cleanup materials (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly VOC emissions limitation was established using the following equation:

VOC = (U*Vc)*(1-CE)

where:

VOC = maximum VOC emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

Vc = VOC content of coating (lb/gal)

CE = Overall control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates and multiple VOC contents.

Compliance with the annual limitation shall be based upon the recordkeeping requirements established in d)(2).

b. Emission Limitation:

VOC emissions shall not exceed 5.82 TPY, including cleanup materials.

Compliance Method:

Compliance with the annual VOC emissions limitation shall be based upon the record keeping specified in d)(2).

c. Emission Limitation:

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

Compliance Method:

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart MMMM.

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

g) Miscellaneous Requirements

(1) None.

18. Emissions Unit Group -D GroupApplication Machines: K042,K043,

EU ID	Operations, Property and/or Equipment Description
K042	Manual brush application of primer and adhesive #1 with dryer vented to a common regenerative thermal oxidizer (RTO)
K043	Manual brush application of primer and adhesive #2 with dryer vented to a common regenerative thermal oxidizer (RTO)

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) b)(1)d. and d)(4)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Volatile organic compound (VOC) emissions shall not exceed 0.04 pound per hour (lb/hr) and 0.18 tons per year (TPY). See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006 (P0110932)	See b)(2)c.
c.	OAC rule 3745-21-09(U)(1)	See b)(2)d. and c)(2)
d.	ORC 3704.03(F)(4)(b)	See d)(4)
e.	40 CFR Part 63, Subpart MMMM (40 CFR Part 63.3880-3981)	See b)(2)e.
f.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)f.

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air

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

b. The hourly and annual VOC emissionslimitations were established to reflect the potential to emit for this emissions unit, as vented to a thermal oxidizer. The monitoring, recordkeeping and testing requirements that ensure VOC emissions from this emissions unit are captured and directed to the thermal oxidizer are sufficient to ensure compliance with these limitations.

c. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

   i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the Volatile Organic Compound (VOC) emissions from this air contaminant source because the uncontrolled potential to emit for VOC is less than 10 TPY.

d. Pursuant to OAC rule 3745-21-09(U)(2)(e)(iii), the limitations identified in OAC rule 3745-21-09(U)(1) do not apply to a coating line that never uses more than ten gallons per day of coating.

e. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:

   i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

   The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are controlled by two thermal oxidizers. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart MMMM, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.

f. Table 2 to subpart MMMM of 40 CFR Part 63 - "Applicability of General Provisions to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) All of the emissions from this emissions unit shall be captured and directed to the RTO whenever the emissions unit is in operation.

[Authority for term:OAC rule 3745-77-07(A)(1)]

(2) The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

[Authority for term: OAC rule 3745-21-09(U)(2)(e)(iii) and OAC rule 3745-77-07(A)(1)]

(3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

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 of each coating material employed; and

b. the number of gallons of each coating material employed.

[Authority for term: OAC rule 3745-21-09(U) and OAC rule 3745-77-07(C)(1)]

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

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

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

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

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

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

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

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

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

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

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

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not

constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

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

(4) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the sourceis subject to 40 CFR Part 63, Subpart MMMM.

[Authority for term: ORC 3704.03(F)(4)(b) and OAC rule 3745-77-07(C)(1)]

(5) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(6) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports 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. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the emissions were not captured and directed to the RTO;

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

iii. each incident of deviation described in "i"or "ii" (above) where a prompt investigation was not conducted;

iv. each incident of deviation described in "i"or "ii" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the

acceptable range, was determined to be necessary and was not taken;and

v. each incident of deviation described in "i"or "ii" where proper records were not maintained for the investigation and/or the corrective action(s).

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

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

(3) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than 10 gallons per day. The notification shall include a copy of such record and shall be sent to the appropriate District Office or local air agency within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-21-09(U) and OAC rule 3745-77-07(C)(1)]

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

f) Testing Requirements

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

a. <u>Emissions Limitations:</u>

VOC emissions shall not exceed 0.04 lb/hr and 0.18 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

<u>Applicable Compliance Method:</u>

The hourly VOC emissions limitation was established using the following equation:

VOC = (U*Vc)*(1-CE)

where:

VOC = maximum VOC emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

Vc = VOC content of coating (lb/gal)

CE = Overall control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates and multiple VOC contents.

The annual VOC limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

b. Emission Limitation:

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

Compliance Method:

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart MMMM.

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

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

a. The emission testing shall be conducted within 6 months prior to the permit expiration;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;

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

Method 18, Method 25 or Method 25A of 40 CFRPart 60, Appendix A.

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

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

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the

proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartMMMM.

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

(6) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

g) Miscellaneous Requirements

(1) None.

19. Emissions Unit Group -E GroupApplication Machines: K044,K045,

EU ID	Operations, Property and/or Equipment Description
K044	Outer Pipe Brush Adhesive Machine No. 1
K045	Outer Pipe Brush Adhesive Machine No.2

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

(1) 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) (P0110932)	Volatile organic compound (VOC) emissions shall not exceed 22.92 pounds per day (lbs/day), excluding cleanup materials, and 4.18 tons per year (TPY), including cleanup materials. See b)(2)a.
b.	OAC rule 3745-21-09(U)(1)	See b)(2)b. and c)(1)
c.	40 CFR Part 63, Subpart MMMM (40 CFR Part 63.3880-3981)	See b)(2)c.
d.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)d.

(2) Additional Terms and Conditions

a. The daily VOC emissions limitation was established to reflect the potential to emit for this emissions unit. It is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

b. Pursuant to OAC rule 3745-21-09(U)(2)(e)(iii), the limitations identified in OAC rule 3745-21-09(U)(1) do not apply to a coating line that never uses more than ten gallons per day of coating.

c. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:

i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are controlled by two thermal oxidizers. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart MMMM, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.

d. Table 2 to subpart MMMM of 40 CFR Part 63 - "Applicability of General Provisions to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

[Authority for term: OAC rule 3745-21-09(U)(2)(e)(iii) and OAC rule 3745-77-07(A)(1)]

(2) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for the coating operation on a daily basis:

a. the name and identification number of each coating employed in the coating line;

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

c. the total volume, in gallons, of all of the coatings employed in the coating line.

[Authority for term: OAC rule 3745-21-09(U) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall collect and record the following information for the coating operation on a monthly basis:

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

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

c. the VOC content of each coating and cleanup material, in pounds per gallon; and

d. the HAP content of each coating and cleanup material, in pounds per gallon of coating solids.

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

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

a. the total VOC emission rate for all coatings and cleanup materials in tons per year.

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

(4) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(5) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than 10 gallons per day. The notification shall include a copy of such record and shall be sent to the appropriate District Office or local air agency within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-21-09(U) and OAC rule 3745-77-07(C)(1)]

(3) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and

identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

f) Testing Requirements

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

a. <u>Emissions Limitations:</u>

VOC emissions shall not exceed 22.92 lbs/day and 4.18 TPY.

<u>Applicable Compliance Method:</u>

The dailyVOC emissions limitation was established using the following equation:

VOC = (U*Vc)* 24 hours per day

where:

VOC = maximum VOC emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

Vc = VOC content of coating (lb/gal)

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates and multiple VOC contents.

Compliance with the annual limitation shall be based upon the recordkeeping requirements established in d)(2).

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

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

Compliance Method:

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart MMMM.

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

(2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartMMMM.

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

(3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

g) Miscellaneous Requirements

(1) None.

20. Emissions Unit Group -F GroupApplication Machines: K057,K058,K059,K060,

EU ID	Operations, Property and/or Equipment Description
K057	Manual brush application of primer and adhesive #3 with dryer vented to a common regenerative thermal oxidizer (RTO)
K058	Manual brush application of primer and adhesive #4 with dryer vented to a common regenerative thermal oxidizer (RTO)
K059	Manual brush application of primer and adhesive #5 with dryer vented to a common regenerative thermal oxidizer (RTO)
K060	Manual brush application of primer and adhesive #6 with dryer vented to a common regenerative thermal oxidizer (RTO)

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) b)(1)d. and d)(6)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Volatile organic compound (VOC) emissions shall not exceed 0.05 pound per hour (lb/hr) and 0.22 tons per year (TPY). See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006 (P0110932)	See b)(2)c.
c.	OAC rule 3745-21-09(U)(1)	See b)(2)d. and c)(2)
d.	ORC 3704.03(F)(4)(b)	See d)(6)
e.	40 CFR Part 63, Subpart MMMM (40 CFR Part 63.3880-3981)	See b)(2)e.
f.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)f.

(2) Additional Terms and Conditions

a. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006,

paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

b. The hourly and annual VOC emissions limitations were established to reflect the potential to emit for this emissions unit, as vented to a thermal oxidizer. The monitoring, recordkeeping and testing requirements that ensure VOC emissions from this emissions unit are captured and directed to the thermal oxidizer are sufficient to ensure compliance with these limitations.

c. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

   i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the Volatile Organic Compound (VOC) emissions from this air contaminant source because the uncontrolled potential to emit for VOC is less than 10 TPY.

d. Pursuant to OAC rule 3745-21-09(U)(2)(e)(iii), the limitations identified in OAC rule 3745-21-09(U)(1) do not apply to a coating line that never uses more than ten gallons per day of coating.

e. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:

   i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

   The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are controlled by two thermal oxidizers. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart MMMM, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.

f. Table 2 to subpart MMMM of 40 CFR Part 63 - "Applicability of General Provisions to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) All of the emissions from this emissions unit shall be captured and directed to the RTO whenever the emissions unit is in operation.

[Authority for term:OAC rule 3745-77-07(A)(1)]

(2) The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

[Authority for term: OAC rule 3745-21-09(U)(2)(e)(iii) and OAC rule 3745-77-07(A)(1)]

(3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for the coating line:

a. the name and identification number of each primer and adhesive coating employed;

b. the volume, in gallons, of each primer and adhesive coating employed; and

c. the total volume, in gallons, of all of the primer and adhesive coatings employed.

[Authority for term: OAC rule 3745-21-09(U) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall collect and record the following information each month for the coating line:

a. the name and identificationnumberfor each primer and adhesive coating and cleanup material employed;

b. the number of gallons of each primer and adhesive coating and cleanup material employed; and

c. theVOC content of each primer and adhesive coating and cleanup material, in pounds per gallon.

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

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

a. the total VOC emission rate for all coatings and cleanup materials in tons per year.

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

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

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

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

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

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

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

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

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee

determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

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

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

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

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

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

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

(6) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the sourceis subject to 40 CFR Part 63, Subpart MMMM.

[Authority for term: ORC 3704.03(F)(4)(b) and OAC rule 3745-77-07(C)(1)]

(7) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(8) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

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.

[Authority for term: OAC rule 3745-15-03(A) and OAC rule 3745-77-07(A)(3)(c)]

(2) The permittee shall submit quarterly deviation (excursion) reports 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. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the emissions were not captured and directed to the RTO;

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

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

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

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

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

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

(3) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than 10 gallons per day. The notification shall include a copy of such record and shall be sent to the appropriate District Office or local air agency within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-21-09(U) and OAC rule 3745-77-07(C)(1)]

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

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

(5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(6) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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

f) Testing Requirements

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

a. <u>Emissions Limitations:</u>

VOC emissions shall not exceed 0.05 lb/hr and 0.22 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

<u>Applicable Compliance Method:</u>

The hourly VOC emissions limitation was established using the following equation:

VOC = (U*Vc)*(1-CE)

where:

VOC = maximum VOC emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

Vc = VOC content of coating (lb/gal)

CE = Overall control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates and multiple VOC contents.

The annual VOC limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

b. Emission Limitation:

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

Compliance Method:

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart MMMM.

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

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

a. The emission testing shall be conducted within 6 months prior to the permit expiration;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;

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

Method 18, Method 25 or Method 25A of 40 CFRPart 60, Appendix A.

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

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

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

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

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the

appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartMMMM.

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

(6) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

g) Miscellaneous Requirements

(1) None.

21. Emissions Unit Group -G GroupApplication Machines: K071,K072,

EU ID	Operations, Property and/or Equipment Description
K071	Index style primer and adhesive application machine no. 2
K072	Index style primer and adhesive application machine no. 3

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) b)(1)f. and d)(10)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001 (P0109490)	Volatile organic compound (VOC) emissions shall not exceed 0.26 pound per hour (lb/hr), excluding cleanup materials Particulate emissions (PE) shall not exceed 0.056 lb/hr and 0.25 ton per year (TPY). See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006 (P0109490)	See b)(2)d.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD)	VOC emissions shall not exceed 1.16 tons per rolling, 12-month period, including cleanup materials. VOC emissions from this emissions unit shall be reduced by an overall control efficiency of at least 97%. See c)(1)
d.	OAC rule 3745-17-11(C)	See c)(2), c)(3), and d)(3) through d)(7)
e.	OAC rule 3745-21-09(U)(1)(i)	VOC emissions shall not exceed 5.1 pounds per gallon of coating solids.
f.	ORC 3704.03(F)(3)(c)	See d)(10)
g.	40 CFR Part 63, Subpart MMMM (40	See b)(2)e.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	CFR Part 63.3880-3981)	
h.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)f.

(2) Additional Terms and Conditions

a. The hourly VOC emissions limitations was established to reflect the potential to emit for this emissions unit taking into consideration the capture and control requirements established under OAC rule 3745-31-05(D) for the control of VOC emissions. The monitoring, recordkeeping, reporting, and testing requirements for the VOC capture and control system as established in the following terms and conditions are sufficient to demonstrate compliance with this limitation.

b. The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit taking into consideration the requirements established under OAC rule 3745-17-11(C) for the control of particulate emissions. The monitoring, recordkeeping, reporting, and testing requirements for the dry particulate filter system as established in the following terms and conditions are sufficient to demonstrate compliance with these limitations.

c. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

d. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source because the uncontrolled potential to emit for PE is less than 10 TPY; and

ii. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the controlled potential to emit for VOC is less than 10 TPY taking into consideration the federally enforceable limitations on the potential to emit established under OAC rule 3745-31-05(D).

e. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:

i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are controlled by two thermal oxidizers. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart MMMM, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.

f. Table 2 to subpart MMMM of 40 CFR Part 63 - "Applicability of General Provisions to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) All of the emissions from this emissions unit shall be captured and directed to the RTO whenever the emissions unit is in operation.

[Authority for term:OAC rule 3745-77-07(A)(1)]

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

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

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

[Authority for term: OAC rule 3745-17-11(C)(2)(e) and OAC rule 3745-77-07(A)(1)]

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

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

(5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

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

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number for each coating and cleanup material employed;

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

c. the VOC content of each coating and cleanup material, in pounds per gallon;

d. the total monthly VOC emissions, in tons; and

e. the rolling, 12-month VOC emissions, in tons.

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

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

a. the name and identification number of each coating used;

b. the mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

c. the maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily volume-weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of all of the coatings; and

d. the calculated, controlled VOC emission rate, in mass of VOC per unit volume of coating solids, as applied. The controlled VOC emission rate shall be calculated using (a) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with d)(2)c above and (b) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the source was in compliance.

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

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

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

(4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

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

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

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

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

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

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

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

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

[Authority for term:OAC rule 3745-17-11(C)(2)(e), OAC rule 3745-17-11(C)(2)(f), OAC rule 3745-17-11(C)(2)(g), and 3745-77-07(C)(1)]

(8) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within $\pm$ 1 percent of the temperature being measured or $\pm$ 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's

recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

[Authority for term:OAC rule 3745-21-09(B)(3) and OAC rule 3745-77-07(C)(1)]

(9) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the temperature readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term:OAC rule 3745-21-09(B)(3) and OAC rule 3745-77-07(C)(1)]

(10) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

[Authority for term: ORC 3704.03(F)(3)(c) and OAC rule 3745-77-07(C)(1)]

(11) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

[Authority for term: 40 CFR Part 63, Subpart MMMM and OAC rule 3745-77-07(C)(1)]

(12) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

[Authority for term: 40 CFR Part 63, Subpart A and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

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. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer’s recommendations

(with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

ii. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the emissions were not captured and directed to the RTO;

iii. each period of time (start time and date, and end time and date)when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

iv. each incident of deviation described in “ii”or “iii” (above) where a prompt investigation was not conducted;

v. each incident of deviation described in “ii”or “iii” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken;

vi. each incident of deviation described in “ii”or “iii” where proper records were not maintained for the investigation and/or the corrective action(s); and

vii. each rolling, 12-month period during which the total OC emissions from this emissions unit exceeded 1.16 tons.

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 deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-15-03(B)(1)(a), and OAC rule 3745-15-03(C)]

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

[Authority for term: 40 CFR Part 63, Subpart MMMM and OAC rule 3745-77-07(C)(1)]

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

[Authority for term: 40 CFR Part 63, Subpart A and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

VOC emissions shall not exceed 0.26 lb/hr, excluding cleanup materials (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly VOC emissions limitation was established using the following equation:

VOC = (U*Vc)*(1-CE)

where:

VOC = maximum VOC emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

Vc = VOC content of coating (lb/gal)

CE = Overall control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates and multiple VOC contents.

b. Emissions Limitation:

PE shall not exceed 0.056 lb/hr and 0.25 TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly PE limitation was established using the following equation:

PE = (U*D*S)*(1-TE)(1-CE)

where:

PE = maximum particulate emissions (lb/hr)

U = maximum coating usage rate (gal/hr)

D = coating density (lb/gal)

S = solids content (percent weight)

TE = Transfer efficiency

CE = Control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple maximum coating usage rates, multiple solids contents, and multiple coating densities.

The annual PE limitation was established by multiplying the hourly limitation by the maximum operating hours in a year (8,760) and then dividing by 2,000.

c. Emissions Limitation:

VOC emissions shall not exceed 1.16 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1).

d. Emissions Limitation:

VOC emissions shall not exceed 5.1 pounds per gallon of coating solids.

Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2) and the following equation:

E = [VOC/(M*S)]*[1-CE]

where:

E = maximum emissions (lb VOC/gallon of solid)

VOC = maximum total VOC emissions for all coatings and thinners (lb/hr)

M = maximum coating application rate (gal/hr)

S = Solids content (percent by volume)

CE = RTO control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple solids contents, multiple coating application rates and combined total VOC emissions.

e. Emission Limitation:

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

Compliance Method:

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart MMMM.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to the permit expiration;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 18, Method 25 or Method 25A of 40 CFRPart 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency;

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-04(A)]

(5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartMMMM.

[Authority for term: 40 CFR Part 63, Subpart MMMM and OAC rule 3745-77-07(C)(1)]

(6) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, SubpartA.

[Authority for term: 40 CFR Part 63, Subpart A and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.