



Environmental Protection Agency

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

9/24/2012

Certified Mail

Mr. Adam Schultz
ABC Inoac Exterior Systems, LLC
1410 Motor Dr.
Fremont, OH 43420

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0372030199
Permit Number: P0110824
Permit Type: Initial Installation
County: Sandusky

Dear Permit Holder:

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

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

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

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

Sincerely,

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

Cc: U.S. EPA
Ohio EPA-NWDO; Michigan; Canada



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
ABC Inoac Exterior Systems, LLC**

Facility ID:	0372030199
Permit Number:	P0110824
Permit Type:	Initial Installation
Issued:	9/24/2012
Effective:	9/24/2012



Division of Air Pollution Control
Permit-to-Install
for
ABC Inoac Exterior Systems, LLC

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Authorization

Facility ID: 0372030199
Facility Description: Coating of plastic parts.
Application Number(s): A0045383
Permit Number: P0110824
Permit Description: Installation of a new paint line (PL #5) consisting of manual wipe booth, prime spray booth, prime flash tunnel, prime curing oven, prime cooling tunnel, color spray booth, color flash tunnel, clear spray booth, clear flash tunnel, clear curing oven, and clear cooling tunnel controlled with a RTO
Permit Type: Initial Installation
Permit Fee: \$200.00
Issue Date: 9/24/2012
Effective Date: 9/24/2012

This document constitutes issuance to:

ABC Inoac Exterior Systems, LLC
1410 Motor Drive
Fremont, OH 43420

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

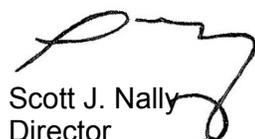
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0110824

Permit Description: Installation of a new paint line (PL #5) consisting of manual wipe booth, prime spray booth, prime flash tunnel, prime curing oven, prime cooling tunnel, color spray booth, color flash tunnel, clear spray booth, clear flash tunnel, clear curing oven, and clear cooling tunnel controlled with a RTO

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

Emissions Unit ID:	K007
Company Equipment ID:	PL #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

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

3. General Requirements

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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

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

andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

- (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

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

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permitteeshall

submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

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

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



records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: K007. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA, Northwest District Office.

C. Emissions Unit Terms and Conditions



1. **K007, PL #5**

Operations, Property and/or Equipment Description:

Paint Line #5 with 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.	ORC 3704.03(T)	See b)(2)a.
b.	OAC rule 3745-31-05(F)	<u>Controlled emissions</u> 3.93lbs volatile organic compounds (VOC)/hour and 17.2 tons VOC/year,combined from the paint line from the RTO stack <u>Uncontrolled emissions</u> 18.0 tonsfugitive VOC/year from the paint line See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 11-30-01	<u>Emissions from natural gas combustion:</u> 0.58 lbnitrogen oxides (NOx)/hour and 2.54 tons NOx/year 0.50 lb carbon monoxide (CO)/hour and 2.20 tons CO/year See b)(2)c.
d.	OAC rule 3745-31-05(A)(3), as effective 12-01-06	See b)(2)d.
e.	OAC rule 3745-17-11(C)	See b)(2)e.
f.	40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-4581) [In accordance with 40 CFR 63.4481(a) & (b) and 40 CFR 63.4482(a), (b), & (c), this emissions	66.4490 0.16 kg (0.16 lb) organic hazardous air pollutant (HAP) emitted per kg (lb) coating solids used during each 12-month compliance period [See b)(2)f.]



Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row 1: unit is a new plastic parts coating line... Row 2: g. 40 CFR Part 63.1-15 [40 CFR Part 63.4501]

(2) Additional Terms and Conditions

- a. The "Best Available Technology" (BAT) requirements under ORC 3704.03(T) have been determined to be the compliance with 40 CFR Part 63, Subpart PPPP.
b. This permit establishes the following legally and practically enforceable operational restrictions for the purpose of limiting potential to emit (PTE).
i. Controlled: 3.93 lbs VOC/hour and 17.2 tons VOC/year, combined from the paint line from the RTO stack; and
ii. Uncontrolled: 18.0 tons fugitive VOC/year from primer booth
c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit.
d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of the OAC rule 3745-31-05 as part of the State Implementation Plan.

oxides (NOx) from this emissions unit since the uncontrolled potential to emit for CO and NOx is less than 10 tons per year.

It should be noted that this air contaminant source has emissions of sulfur dioxide (SO₂), particulate matter 10 microns or less in size (PM₁₀) and volatile organic compounds (VOC) which are associated with the combustion of natural gas. The potential emissions of SO₂, PM₁₀ and VOC from natural gas combustion are negligible and therefore have not been addressed within this permit.

- e. The permittee shall operate the wet scrubber and 3-stage fabric filter control systems whenever this emissions unit is in operation.
- f. The options for compliance when using more than one type of coating are described in 40 CFR 63.4490(c). In accordance with this rule, the permittee may meet the emissions limit of each coating type individually, or may calculate a facility specific emissions limit. The permittee is required to maintain documentation as required by 63.4530(c), and submit reports demonstrating compliance, as required in 63.4520.
- g. The permittee has elected to use the compliance option provided by 40 CFR 63.4491(c) – emission rate with add-on controls option. This is accomplished by demonstrating that the organic HAP emissions rate for the coating operation (with emissions reductions achieved by emission capture systems and add-on controls) is less than or equal to the applicable emission limit in 63.4490, calculated as a rolling 12-month emissions rate and determined on a monthly basis. The permittee may use any of the three compliance options [63.4491(a), (b), or (c)], as described in 63.4491, however, the permittee must meet all of the requirements of each option when it is used. [See 40 CFR 63.4480-4581.]
- h. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart PPPP (the predominant activity at the facility) including the following sections:

63.4500 and 64.501

c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit PTE [see b)(2)a.):
 - a. For VOC emissions, this emissions unit shall be vented to a RTO which achieves an overall capture efficiency of 98% (based on a 90% capture efficiency for the prime booth and 100% capture efficiency from the rest of the paint line) and a 98% destruction efficiency from the entire paint line.
- (2) The permittee shall burn only natural gas in this emissions unit.
- (3) The permittee shall operate and maintain the wet scrubber and 3-stage fabric filters for the surface coating operations in accordance with the manufacturer's recommendations,

instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The wet scrubber and 3-stage fabric filter control shall be employed during all periods of coating application to control particulate emissions.

- (4) The permittee shall expeditiously repair the wet scrubber and/or 3-stage fabric filters or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
- (5) The permittee shall comply with the operational restrictions required under 40 CFR Part 63, Subpart PPPP (the predominant activity at the facility) including the following sections:

40 CFR 63.4492 and 63.4493

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month from coating operations for the entire line (cleanup operations associated with the coating operations are permitted under emissions unit P801):
 - a. the name and identification number of each coating material, as applied;
 - b. the VOC content of each coating material, as applied, in pounds per gallon;
 - c. the number of gallons of each coating employed in the paint line;
 - d. the uncontrolled VOC emissions from the paint line, in lbs[summation of the products of d)(1)b. x d)(1)c.];
 - e. the overall control efficiency determined for the thermal oxidizer during the most recent demonstration of compliance;
 - f. the total uncaptured(fugitive) VOC emissions from the paint line, in tons [d)(1)d. x 0.02 x 1 ton/2000 lbs];
 - g. the total controlled VOC emissions from all coating materials applied, in lbs [summation of d)(1)d. x d)(1)e.]and;
 - h. the annual year-to-date controlled VOC emissions, in tons, for all coating materials employed [summation of d)(1)g. for each calendar month to date from January to December divided by 2000 lbs/ton].
- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be 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. Until compliance testing has been conducted, the thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.

- (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 ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
- a. all 3-hour blocks of time, when the emissions unit(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.

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

- (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:

- f. a description of the corrective action;

- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. 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.

- (4) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the wet scrubber and 3-stage filter control system, 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.
- (6) The permittee shall conduct periodic inspections of the wet scrubber and 3-stage filter control 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.
- (7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the wet scrubber and 3-stage filter control 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.
- (8) The permittee shall document each inspection (periodic and annual) of the wet scrubber and 3-stage filter control 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.

- (9) The permittee shall maintain records that document any time periods when the wet scrubber and/or 3-stage filter control was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the wet scrubber and/or 3-stage filter control 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.
- (10) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart P (the predominant activity at the facility) including the following sections:

63.4530, 63.4531, 63.4561, 63.4563, 63.4567 and 63.4568

e) Reporting Requirements

- (1) The permittee shall submit annual reports that summarize the total annual actual VOC emissions from this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- (2) The permittee shall submit quarterly summaries of the following records:
 - a. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
 - b. any records of downtime (date and length of time) for the capture (collection) system, the thermal oxidizer, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
 - c. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit(s).

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

- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any daily record showing that the wet scrubber/3-stage filter control 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.

- (5) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate OHIO EPA District Office or local air agency, as are required pursuant to 40 CFR Part 63, Subpart PPPP (the predominant activity at the facility) per the following sections:

63.4510 and 63.4520

f) Testing Requirements

- (1) 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 180 days after initial startup of the emissions unit unless otherwise approved by the Ohio EPA, Northwest District Office;
 - b. The emission testing shall be conducted to demonstrate compliance with the following:
 - i. 98% capture efficiency for VOC emissions from the paint line;
 - ii. 98% destruction efficiency from the RTO;
 - iii. a mass emission rate of 3.93 pounds VOC per hour from the RTO;
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for VOC, Methods 1-4 and 18, 25, or 25A, as applicable of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the control efficiency for VOC are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. 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.) 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 Methods 18, 25, or 25A of 40 CFR Part 60, Appendix A and Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.”

- e. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and the outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Methods 18, 25, or 25 A of 40 CFR Part 60, Appendix A. 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.
- f. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.
- g. 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).
- h. 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.
- i. 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

submission of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

- j. The permittee shall comply with the applicable compliance procedures and performance test methods as required under 40 CFR Part 63, Subpart P (the predominant activity at the facility) including the following sections:

63.4560, 63.4564, 63.4565, 63.4566 and 63.4567

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

- a. Emission Limitation:

3.93 lbs volatile organic compounds (VOC)/hour and 17.2 tons VOC/year, combined from the paint line from the RTO stack

Applicable Compliance Method:

The permittee shall determine compliance with the hourly VOC emission limitation based on the results of the emission testing conducted in accordance with f)(1) above and through the recordkeeping requirements specified in d)(1) above.

The annual emission limitation represents the potential to emit and was developed by multiplying the hourly emission rate by 8760 hours per year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual emission limitation shall be demonstrated.

- b. Emission Limitation:

18.0 tons fugitive VOC/year from the paint line

Applicable Compliance Method:

The annual fugitive VOC emission limitation shall be demonstrated through recordkeeping requirements specified in d)(1) above.

- c. Emission Limitation:

0.58 lbNOx/hour and 2.54 tons NOx/year

Applicable Compliance Method:

The emission limitation represents the potential to emit* for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are required to demonstrate compliance with these limitations.

*The potential to emit for this emissions unit is based on the combined maximum heat input from the RTO and (2) curing ovens, of 6.0 mmBtu/hour multiplied by the emission factor 100 lbsNOx/mm scf and dividing by 1020 mm Btu/mm scf from AP-42 Table 1.4-1 (revised 7/98).

The annual limitation was developed by multiplying the hourly emission rate by 8760 hours per year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual emission limitation shall be demonstrated.

d. Emission Limitation:

0.50 lb CO/hour and 2.20 tons CO/year

Applicable Compliance Method:

The emission limitation represents the potential to emit* for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are required to demonstrate compliance with these limitations.

*The potential to emit for this emissions unit is based on the combined maximum heat input from the RTO and (2) curing ovens, of 6.0 mmBtu/hour multiplied by the emission factor 84 lbs CO/mm scf and dividing by 1020 mm Btu/mm scf from AP-42 Table 1.4-1 (revised 7/98).

The annual limitation was developed by multiplying the hourly emission rate by 8760 hours per year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual emission limitation shall be demonstrated.

e. Emission Limitation:

0.16 kg (0.16 lb) organic hazardous air pollutant (HAP) emitted per kg (lb) coating solids used during each 12-month compliance period

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation based on the results of emissions testing conducted in accordance with 40 CFR 63.4491(a) through(c) and 40 CFR 63.4540 through 40 CFR 63.4568.

g) Miscellaneous Requirements

(1) None.