



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

11/6/2012

Misti Nehus
METOKOTE CORP PLANT NO 9
1540 Cainsville Road
Lebanon, TN 37090

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

Facility ID: 0247120821
Permit Number: P0111496
Permit Type: Administrative Modification
County: Lorain

Certified Mail

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

Dear Permit Holder:

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

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

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

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

Sincerely,

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

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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

This permit is an administrative modification to issue a Federally Enforceable Permit to Install and Operate (FEPTIO) renewal permit for emissions units P005 and P006 (burn off furnaces/ovens).

3. Facility Emissions and Attainment Status:

MetoKote Corporation Plant 9 is located in Sheffield Village, Ohio, in Lorain County and currently classified as a non-TV facility. Lorain County is currently in attainment for all criteria pollutants.

4. Source Emissions:

Because of miscellaneous metal parts coating lines at the facility (emissions units K003, K014, and K015), HAP emissions could potentially exceed the 10 tons per year and 25 tons per year thresholds for single and combined HAPs, respectively. The facility would be potentially subject to the requirements of 40 CFR Part 63, Subpart M. Although emissions of organic compounds from the burn off ovens are not at levels required to be permitted, any HAP emissions would contribute to the facility-wide HAP emissions.

5. Conclusion:

The federally enforceable restrictions cited in this permit limits the facility-wide HAPs emissions to not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for combined HAPs, based upon rolling, 12-month summations.

6. Please provide additional notes or comments as necessary:

None

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

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|----------------------|----------------------|
| <u>Single HAP</u> | <u>9.9</u> |
| <u>Combined HAPs</u> | <u>24.9</u> |

PUBLIC NOTICE

11/6/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

METOKOTE CORP PLANT NO 9

5477 EVERGREEN PKWY,

Sheffield, OH 44054

Lorain County

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

PERMIT #: P0111496

PERMIT TYPE: Administrative Modification

PERMIT DESC: Controlled pyrolysis cleaning furnace, Model No. PRC-680, and batch burn oven, Model 8714, for cleaning organic residues from metal parts

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



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
METOKOTE CORP PLANT NO 9**

| | |
|----------------|-----------------------------------|
| Facility ID: | 0247120821 |
| Permit Number: | P0111496 |
| Permit Type: | Administrative Modification |
| Issued: | 11/6/2012 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |



Division of Air Pollution Control
Permit-to-Install and Operate
for
METOKOTE CORP PLANT NO 9

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Draft Permit-to-Install and Operate

METOKOTE CORP PLANT NO 9

Permit Number: P0111496

Facility ID: 0247120821

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0247120821
Application Number(s): M0001949, M0001950, M0001953
Permit Number: P0111496
Permit Description: Controlled pyrolysis cleaning furnace, Model No. PRC-680, and batch burn oven, Model 8714, for cleaning organic residues from metal parts
Permit Type: Administrative Modification
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/6/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

METOKOTE CORP PLANT NO 9
5477 EVERGREEN PKWY
Sheffield, OH 44054

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

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Draft Permit-to-Install and Operate

METOKOTE CORP PLANT NO 9

Permit Number: P0111496

Facility ID: 0247120821

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0111496

Permit Description: Controlled pyrolysis cleaning furnace, Model No. PRC-680, and batch burn oven, Model 8714, for cleaning organic residues from metal parts

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

Emissions Unit ID:

P005

Company Equipment ID:

Controlled pyrolysis cleaning furnace, Model No. PRC-680, fo

Superseded Permit Number:

02-14332

General Permit Category and Type:

Not Applicable

Emissions Unit ID:

P006

Company Equipment ID:

P006

Superseded Permit Number:

P0110024

General Permit Category and Type:

Not Applicable



Draft Permit-to-Install and Operate
METOKOTE CORP PLANT NO 9
Permit Number: P0111496
Facility ID: 0247120821
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

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

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

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

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



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

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

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

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

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

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



Draft Permit-to-Install and Operate
METOKOTE CORP PLANT NO 9
Permit Number: P0111496
Facility ID: 0247120821
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations. Although Ohio EPA has determined that this area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.

3. The emissions of hazardous air pollutants (HAP), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 tons per year (tpy) for any individual HAP and 24.9 tpy for total combined HAP, based upon rolling, 12-month summations.

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

| <u>Month(s)</u> | <u>Maximum Allowable</u> | <u>Maximum Allowable</u> |
|-----------------|------------------------------|----------------------------------|
| | <u>Cumulative Individual</u> | <u>Cumulative Total Combined</u> |
| | <u>HAP Emissions</u> | <u>HAP Emissions</u> |
| | <u>(tons)</u> | <u>(tons)</u> |
| 1 | 2.5 | 6.3 |
| 1-2 | 5.0 | 12.5 |
| 1-3 | 7.5 | 18.8 |
| 1-4 | 9.9 | 24.9 |
| 1-5 | 9.9 | 24.9 |
| 1-6 | 9.9 | 24.9 |



| <u>Month(s)</u> | <u>Maximum Allowable</u> | |
|-----------------|------------------------------|----------------------------------|
| | <u>Cumulative Individual</u> | <u>Cumulative Total Combined</u> |
| | <u>HAP Emissions</u> | <u>HAP Emissions</u> |
| | <u>(tons)</u> | <u>(tons)</u> |
| 1-7 | 9.9 | 24.9 |
| 1-8 | 9.9 | 24.9 |
| 1-9 | 9.9 | 24.9 |
| 1-10 | 9.9 | 24.9 |
| 1-11 | 9.9 | 24.9 |
| 1-12 | 9.9 | 24.9 |

After the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitations for individual HAP and total combined HAP shall be based upon a rolling, 12-month summation of the individual HAP and total combined HAP emissions each.

4. The permittee shall collect and record the following information each month for the entire facility:
 - a) the name and identification number of each coating and cleanup employed;
 - b) the individual hazardous air pollutant (HAP)* content for each HAP of each coating and cleanup, in pounds of individual HAP per gallon, as applied;
 - c) the total combined HAP content of each coating and cleanup, in pounds of combined HAPs per gallon, as applied [the sum of all the individual HAP contents from B.4.b)];
 - d) the number of gallons of each coating and cleanup employed;
 - e) the total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons per month [for each HAP, the sum of B.4.b) times B.4.d) for each coating and cleanup material];
 - f) the total combined HAP emissions from all coating materials and cleanup materials employed, in tons per month [the sum of B.4.c) times B.4.d)] for each coating and cleanup material];
 - g) beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons; and
 - h) beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the total combined HAP emissions from all coating materials and cleanup materials employed, in tons.



Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative individual HAP emissions for each HAP and the total combined HAP emissions for each calendar month.

* A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

5. 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:
 - (1) all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;
 - (2) all exceedances of the rolling, 12-month emission limitation for total combined HAP and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;
 - b) the probable cause of each deviation (excursion);
 - c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d) the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

6. The permittee shall also submit annual reports that specify the individual HAP and total combined HAP 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.
7. Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.



8. Compliance with the emission limitations in B.3 shall be determined in accordance with the following methods:

a) Emission Limitation:

Individual HAP emissions from this facility shall not exceed 9.9 tpy, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in B.4 for each individual HAP.

b) Emission Limitation:

Total combined HAP emissions from this facility shall not exceed 24.9 tpy, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in B.4 for total combined HAP.



Draft Permit-to-Install and Operate
METOKOTE CORP PLANT NO 9
Permit Number: P0111496
Facility ID: 0247120821
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P005, Controlled pyrolysis cleaning furnace, Model No. PRC-680

Operations, Property and/or Equipment Description:

Controlled Pyrolysis cleaning furnace, Model No. PRC-680, for cleaning organic residues from metal parts

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

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

a. None.

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

a. b)(1)d

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) | Particulate matter emissions from the stack associated with this emissions unit shall not exceed 2.42 tons per year. Visible particulate emissions from the stack associated with this emissions unit shall not exceed 5% opacity as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(1). |
| b. | OAC rule 3745-17-07(A)(1) | The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| c. | OAC rule 3745-17-11(B)(1) | Particulate matter emissions from the stack associated with this emissions unit |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|---|---|
| | | shall not exceed 0.551 pound per hour. |
| d. | OAC rule 3745-31-05(D) (Synthetic Minor to avoid MACT) | See B.2 through B.8. |

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The average combustion temperature within the secondary chamber of the furnace, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1450 degrees Fahrenheit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the secondary chamber of the furnace when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. all 3-hour blocks of time during which the average combustion temperature within the secondary chamber of the furnace, when the emissions unit was in operation, was less than 1450 degrees Fahrenheit; and

b. a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

(3) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and



- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d)(3)d above or continue the weekly check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate the abnormal visible emissions.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.
- (2) The permittee shall identify the following information in the annual PER:
 - a. all days during which the secondary combustion chamber temperature was less than 1450 degrees Fahrenheit when the emissions unit was in operation and any corrective actions taken; and
 - b. all days during which any visible particulate emissions were observed from the stack serving this emissions unit and any corrective actions taken.

f) Testing Requirements

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

- a. Emission Limitation:

Particulate matter emissions from the stack associated with this emissions unit shall not exceed 2.42 tons per year.

- Applicable Compliance Method:

To determine the annual rate of particulate emissions, the following equation shall be used:

$$E \text{ (tpy)} = 0.551 \text{ lb/hr} \times 8760 \text{ hrs/yr} \times 1 \text{ ton/2000 lbs}$$

where:



0.551 lb/hr = allowable hourly particulate emission rate, in tons/yr;

8760 hrs/yr = conversion of hours to years; and

1 ton/2000 lbs = conversion of pounds to tons.

b. Emission Limitation:

Visible particulate emissions from the stack associated with this emissions unit shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

c. Emission Limitation:

Particulate matter emissions from the stack associated with this emissions unit shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03.

g) Miscellaneous Requirements

(1) None.



2. P006, Batch burn off oven, Model 8714

Operations, Property and/or Equipment Description:

Batch Burn Off Oven, Model 8714 for cleaning organic residue from metal parts

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

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

a. None.

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

a. b)(1)f

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 | Visible particulate emissions from the stack associated with this emissions unit shall not exceed 5% opacity as a 6-minute average. Particulate matter emissions less than 10 microns in diameter (PM ₁₀) from the stack associated with this emissions unit shall not exceed 0.04 pound per hour and 0.2 ton per year. See b)(2)a, b)(2)b and b)(2)e. |
| b. | OAC rule 3745-31-05(A)(3)(b) as effective 12/01/06 | See b)(2)c. |
| c. | OAC rule 3745-17-07(A)(1) | See b)(2)d. |
| d. | OAC rule 3745-17-09(B) | Particulate emissions shall not exceed 0.20 pound per 100 pounds of liquid, semi-solid or solid refuse and salvageable material charged. |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|---|---|
| e. | OAC rule 3745-17-09(C) | See b)(2)f. |
| f. | OAC rule 3745-31-05(D) (Synthetic Minor to avoid MACT) | See B.2 through B.8. |

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) requirements for this emissions unit have been determined to be the use of an afterburner.
- b. 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. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the 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. Once U.S. EPA approves the December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.
- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this emissions unit since the calculated uncontrolled potential to emit for particulate emissions is less than 10 tons per year.
- d. In accordance with b)(2)b, pending SIP approval, the opacity limitation required by this applicable rule is less stringent than the opacity limitation established pursuant to OAC rule 3745-31-05(A)(3).

After the SIP is approved by the U.S. EPA, visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- e. All particulate emissions are PM₁₀.
- f. Incinerators, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.

c) Operational Restrictions

- (1) The emissions unit shall be installed, operated and maintained in accordance with the manufacturer's specifications. The permittee shall not change any of the manufacturer's



factory preset parameters for the equipment, or physically modify the equipment in any way, without first verifying with the manufacturer that the change(s) would not adversely affect air contaminant emissions from the unit.

(2) The emissions unit shall be designed and operated in accordance with the following requirements:

a. The secondary combustion chamber shall be operated so that the exit gas temperature from the chamber is, at a minimum, 1400 degrees Fahrenheit, taking into account normal start-up procedures.

b. The secondary combustion chamber shall allow for a minimum 0.5 second retention time at 1400 degrees Fahrenheit, taking into account normal start-up procedures.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and properly maintain a temperature gauge which monitors the temperature of the secondary combustion chamber.

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

a. the secondary combustion chamber temperature when the emissions unit is in operation;

b. a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the emissions unit is in operation; and

c. the number of batches processed in the emissions unit.

(3) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d)(3)d above or continue the weekly check until the incident has ended. The observer may indicate that the visible emissions incident was continuous



during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate the abnormal visible emissions.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.
- (2) The permittee shall identify the following information in the annual PER:
 - a. all days during which the secondary combustion chamber temperature was less than 1400 degrees Fahrenheit when the emissions unit was in operation and any corrective actions taken; and
 - b. all days during which any visible particulate emissions were observed from the stack serving this emissions unit and any corrective actions taken.

f) Testing Requirements

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

a. Emission Limitation:

PM₁₀ emissions from the stack associated with this emissions unit shall not exceed 0.04 pound per hour and 0.2 ton per year.

Applicable Compliance Method:

The hourly emission limitation was developed by multiplying the emission limitation of 0.20 pound particulate emissions per 100 pounds of material charged by a maximum charging capacity of 20 pounds per hour.

If required, compliance with the hourly emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 40 CFR Part 51, Appendix M, Methods 201/201A and 202.

The annual emission limitation was developed by multiplying the pound per hour emission limitation of 0.04 by a maximum operating schedule of 8760 hours per year and dividing by 2000 pounds per ton. Therefore, provided compliance is



shown with the 0.20 pound particulate emissions per 100 pounds of material charged limitation, compliance is demonstrated with the annual emission limitation.

b. Emission Limitation:

Visible particulate emissions from the stack associated with this emissions unit shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

c. Emission Limitation:

Particulate emissions shall not exceed 0.20 pound per 100 pounds of liquid, semi-solid or solid refuse and salvageable material charged.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be demonstrated in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(8).

d. Emission Limitation:

Visible particulate emissions from the stack associated with this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance with the above emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

- (1) None.