



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
SHELBY COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

Application No: 05-14417

Fac ID: 0575010103

DATE: 10/4/2007

Alcoa Building Products Inc
Jesse Aiken
2615 Campbell Rd
Sidney, OH 45365

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$500** will be due. Please do not submit any payment now.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

C: USEPA

SWDO

IN

SHELBY COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL

05-14417 FOR AN AIR CONTAMINANT SOURCE FOR Alcoa Building Products Inc

On 10/4/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Alcoa Building Products Inc**, located at **2615 Campbell Rd, Sidney, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 05-14417:

Replacement of the incinerator, installation of new coating nozzles, and drying oven along with increasing production rate on emissions unit K002, 54 inch Coil Coating Line.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Jeff Hines, Ohio EPA, Southwest District Office, 401 East Fifth Street, Dayton, OH 45402-2911
[(937)285-6357]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 05-14417

Application Number: 05-14417
Facility ID: 0575010103
Permit Fee: **To be entered upon final issuance**
Name of Facility: Alcoa Building Products Inc
Person to Contact: Jesse Aiken
Address: 2615 Campbell Rd
Sidney, OH 45365

Location of proposed air contaminant source(s) [emissions unit(s)]:

**2615 Campbell Rd
Sidney, Ohio**

Description of proposed emissions unit(s):

Replacement of the incinerator, installation of new coating nozzles, and drying oven along with increasing production rate on emissions unit K002, 54 inch Coil Coating Line.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Chris Korleski
Director

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, 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 appropriate Ohio EPA District Office or local air agency. The written

Alcoa Building Products Inc
PTI Application: 05-14417

Facility ID: 0575010103

Issued: To be entered upon final issuance

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 B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency 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.
 - iv. If this permit is for an emissions unit located at a Title V facility, then 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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

Alcoa Building Products Inc

PTI Application: 05-14417

Issued: To be entered upon final issuance

Facility ID: 0575010103

permittee shall comply with the requirement to register such a plan.

4. 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.

5. Severability Clause

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

6. 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.

Alcoa Building Products Inc
PTI Application: 05-14417
Issued: To be entered upon final issuance

Facility ID: 0575010103

7. 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.

Alcoa Building Products Inc

PTI Application: 05-14417

Issued: To be entered upon final issuance

Facility ID: 0575010103

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any 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. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. 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.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

Alcoa Building Products Inc
PTI Application: 05-14417
Issued: To be entered upon final issuance

Facility ID: 0575010103

- ii. 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.

10. Permit-To-Operate Application

- a. If 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).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in

Alcoa Building Products Inc
PTI Application: 05-14417
Issued: To be entered upon final issuance
this permit.

Facility ID: 0575010103

Alcoa Building Products Inc

Facility ID: 0575010103

PTI Application: 05-14417

Issued: To be entered upon final issuance

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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.

2. 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 appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (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 appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

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

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing 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

Alcoa Building Products Inc

PTI Application: 05-14417

Facility ID: 0575010103

Issued: To be entered upon final issuance

installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

5. Construction of New Sources(s)

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.

6. 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.

7. 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).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

Alcoa Building Products Inc

PTI Application: 05-14417

Issued: To be entered upon final issuance

Facility ID: 0575010103

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

Alcoa Building Products Inc**Facility ID: 0575010103****PTI Application: 05-14417****Issued: To be entered upon final issuance****C. Permit-To-Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	425.51
NOx	64.05
CO	27.71
PE	1.7
SO2	0.18
OC	425.51

Alcoa Building Products Inc

PTI Application: 05-14417

Issued: To be entered upon final issuance

Facility ID: 0575010103

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(K002) - 54 inch Coil Coating Line with pretreat coater and curing ovens controlled with a thermal incinerator

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from the coating operation, including solvent cleanup activities, shall not exceed 425.51 tons per rolling 12-month period.</p> <p>Carbon monoxide (CO) emissions from from this emissions unit, shall not exceed 27.71 tons per rolling 12-month period, including the CO generated by the combust of the VOC's generated in the coating operations and combusted in the thermal incinerator..</p> <p>Nitrogen oxide (NO_x) emissions from this emissions unit, shall not exceed 64.05 tons per rolling 12-month period, including the NO_x generated by the combust of the VOC's generated in the coating operations and combusted in the thermal incinerator.</p> <p>Emissions from natural gas combustion in the air make-up units, oven burners, pretreat oven burners, and thermal oxidizer shall not exceed 14.62 lbs NO_x/hr and 6.33 lbs CO/hr.</p> <p>See section A.I.2.a</p>

Emissions Unit ID: K002

<p>OAC rule 3745-21-09(E) and OAC rule 3745-21-09(B)(6)</p>	<p>When the capture and control system is not employed, VOC emissions shall not exceed 2.6 lbs/gallon of coating excluding water and exempt solvents, as the maximum VOC content of each coating or as a daily volume-weighted average; or 4.0 lbs/gallon of solids when using the thermal oxidizer.</p> <p>or</p> <p>The capture and control system shall provide not less than an 81 percent reduction, by weight, in the overall VOC emissions from the coating line and the reduction efficiency of the thermal oxidizer shall not be less than 90 percent, by weight, for the VOC emissions vented to it.</p>
<p>40 CFR Part 60, Subpart TT</p>	<p>Compliance Option TT_n:</p> <p>VOC emissions shall not exceed 0.28 kg/liter (2.34 lb/gal) of coating solids applied for each calendar month without the use of the thermal oxidizer</p> <p>Compliance Option TT_c:</p> <p>VOC emissions shall not exceed 0.14 kg/liter (1.17 lbs/gal) of coating solids applied for each calendar month with the use of the thermal oxidizer.</p> <p>Compliance Option TT_{ce}:</p> <p>VOC emissions (stack and fugitive) shall not exceed 10 percent of the VOC's employed for each calendar month.</p> <p>Compliance Option TT_i:</p> <p>VOC emissions shall not exceed 0.28 kg/liter (2.34 lb/gal) of coating solids applied for each calendar month with intermittent use of the thermal oxidizer.</p> <p>See section A.I.2.b below</p>

<p>40 CFR Part 63, Subpart SSSS</p>	<p>Compliance Option SSSS_e:</p> <p>Organic HAP emissions shall not exceed 0.046 kg/liter (0.38 lbs/gallon) of solids applied during each rolling 12-month compliance period.</p> <p>Compliance Option SSSS_{ce}:</p> <p>Organic HAP emissions (stack and fugitive) shall not exceed 2 percent of the organic HAP applied during each rolling 12-month compliance period (98 percent reduction).</p> <p>See section A.1.2.b through d.</p>
<p>ORC 3704.03(T)(4)</p>	<p>See section A.2.e.</p>

2. Additional Terms and Conditions

- 2.a** The emission limitations for NO_x and CO from natural gas combustion in the air make-up units, oven burners, pretreat oven burners, and thermal oxidizer were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, establishing record keeping and reporting requirements to ensure compliance with these limitations is not necessary.
- 2.b** The permittee shall employ all of the associated monitoring, record keeping, reporting and testing methods required by this permit at all times for the compliance options that are being used to determine compliance for 40 CFR 60, Subpart TT, and 40 CFR 63, Subpart SSSS.
- 2.c** Compliance with the compliance options established pursuant to 40 CFR Part 63, Subpart SSSS may be demonstrated for each individual coating line, to multiple lines as a group, or to the entire affected source.
- 2.d** Compliance with 40 CFR 63, Subpart SSSS, Option SSSS_e, shall be demonstrated by use of
 - i. "as purchased" compliant coatings;
 - ii. "as applied" compliant coatings;
 - iii. using only always-controlled work stations vented to the thermal oxidizer; or
 - iv. a combination of compliant coatings and use of the thermal oxidizer and maintaining an acceptable equivalent emission rate.

Issued: To be entered upon final issuance

- 2.e** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) and SO₂ emissions from this emissions unit since the potential emissions are less than ten tons per year.

II. Operational Restrictions

1. Per 40 CFR 60.464(c), the average thermal oxidizer combustion temperature shall not, for more than 3 hours, fall more than 28 degrees Celsius (50 degrees Fahrenheit) below the temperature at which compliance with 40 CFR 60, Subpart TT was demonstrated during the most recent measurement of thermal oxidizer efficiency required by 40 CFR 60.8.
2. The emission capture system shall be operated and maintained according to the capture system monitoring plan required under 40 CFR 63.5150(a)(4).
3. Per Table 1 to 40 CFR Part 63, Subpart SSSS, the 3-hour block average regenerative thermal oxidizer combustion temperature shall not fall below the average combustion temperature limit established during the most recent emission test that demonstrated the emissions unit was in compliance.
4. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, using only always-controlled work stations vented the thermal oxidizer, the permittee shall continuously monitor the operating parameter established in accordance with 40 CFR 63.5150(a)(3).
5. When a control device is employed to compliance with the emissions limitations of 40 CFR Part 63, Subpart SSSS, the permittee shall maintain a monitoring system, including any applicable records, that would demonstrate continuous compliance with the average operating parameter values as established in 40 CFR 63.5150(a)(3) for each 3-hour block period, each capture system operating parameter value as established in 40 CFR 63.5150(a)(4) for each 3-hour block period; and the appropriate organic HAP emission rate based on solids applied, as required by 40 CFR Part 63, Subpart SSSS.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain the following monthly records on all cleanup materials employed in this emissions unit:
 - a. the name and identification number of each cleanup solvent employed;

Emissions Unit ID: K002

- b. the volume, in gallons, of each cleanup solvent;
 - c. the VOC content for each cleanup solvent, in pounds per gallon;
 - d. the volume of waste cleanup solvents disposed of or reclaimed, in gallons;
 - e. the VOC content of the waste cleanup solvents disposed of or reclaimed, in pounds per gallon; and
 - f. the VOC emissions from the use of cleanup solvents, in tons per month, (the summation of: $\{[("b" \times "c") - ("d" \times "e")]/ 2000 \text{ lbs/ton}\}$).
2. The permittee shall maintain the following daily records on the coating materials employed in this emissions unit for each coating process when the control device is not employed:
- a. the date the specific coating process was operated and not vented to the control device;
 - b. the specific coating process that was operated without being vented to the control device;
 - c. the name and identification number of each coating, employed in the specific coating process;
 - d. the VOC content of each coating employed in the specific coating process, in pounds per gallon of coating, excluding water and exempt solvents, as applied;
 - e. the total amount of each coating employed in the specific coating process, in gallons per day, excluding water and exempt solvents, as applied;
 - f. the amount of coatings employed, in gallons per day, excluding water and exempt solvents, (the summation of: (the combined total of all coatings employed ("e"))).
 - g. the amount of VOC emitted from the coatings employed, in pounds per day, (the summation of: (the combined total of all ("d" x "e")); and
 - h. the daily volume weighted average VOC discharged from the coatings employed, in pounds of VOC per gallon of coating, excluding water and exempt solvents, as applied, (the summation of: ("g"/"f")).
3. The permittee shall maintain the following daily records on the coating materials employed in this emissions unit for each coating process when the control device is employed:

Issued: To be entered upon final issuance

- a. the date the specific coating process was operated and vented to the control device;
 - b. the specific coating process that was operated and vented to the control device;
 - c. the name and identification number of each coating, employed in the specific coating process;
 - d. the VOC content of each coating employed in the specific coating process, in pounds per gallon of coating, as applied;
 - e. the solids content of the each coating, in percent by volume;
 - f. the total amount of each coating employed in the specific coating process, in gallons per day, as applied;
 - g. the amount of solids applied from each coating employed, in gallons per day, (the summation of: ("e" x "f")).
 - h. the amount of VOC generated from the each coatings employed, in pounds per day, (the summation of: ("d" x "f"));
 - i. the total amount of solids applied, in gallons per day, (the summation of: (all "g"));
 - j. the total amount of VOC's generated, in pounds per day, (the summation of: (all "h"));
 - k. the total amount of VOC discharged, in pounds per day, (the summation of: ("j" x (1- Overall removal efficiency of the capture and control system*)); and
 - l. the daily volume weighted average VOC discharged from the coatings employed, in pounds of VOC per gallon of solids applied, (the summation of: ("k"/"i")).
4. The permittee shall maintain the following monthly records on the coating materials employed in this emissions unit for each coating process when the control device is not employed:
 - a. the date the specific coating process was operated and not vented to the control device;

Issued: To be entered upon final issuance

- b. the specific coating process that was operated and not vented to the control device;
 - c. the name and identification number of each coating, employed in the specific coating process;
 - d. the VOC content of each coating employed in the specific coating process, in pounds per gallon of coating, as applied;
 - e. the solids content of the each coating, in percent by volume;
 - f. the total amount of each coating employed in the specific coating process, in gallons per month, as applied;
 - g. the amount of solids applied from each coating employed, in gallons per month, (the summation of: ("e" x "f")).
 - h. the amount of VOC generated from the each coatings employed, in pounds per month, (the summation of: ("d" x "f"));
 - i. the total amount of solids applied, in gallons per month, (the summation of: (all "g"));
 - j. the total amount of VOC's generated, in pounds per month, (the summation of: (all "h"));
 - k. the monthly volume weighted average VOC discharged from the coatings employed, in pounds of VOC per gallon of solids applied, (the summation of: ("k"/"i")); and
 - l. the monthly volume weighted VOC content, in kilograms per liter of solids applied, (the summation of: ("k" x 0.1198).
5. When the capture and control system is employed on a specific coating process in this emissions unit, the permittee shall collect and record the following monthly information:
- a. the date the specific coating process was operated and vented to the control device;
 - b. the specific coating process that was being vented to the control device;

Emissions Unit ID: K002

- c. the name and identification number of each coating, employed in the specific coating process;
- d. the VOC content of the coating being employed, in pounds per gallon, as applied;
- e. the amount of coating employed, in gallons per month;
- f. the total VOC generated, in tons per month (the summation of: { [sum of all coatings employed ("d" x "e")] / 2000 lbs/ton});
- g. the solids content of each coating employed, in percent by volume;
- h. the amount of solids applied, in gallons per month, (the summation of: ("e" x "g"));
- i. the overall capture and control efficiency, in percent by weight (based on the results from the most recent stack test results);
- j. the total controlled emissions, in tons per month, (the summation of: ["f" x (1-"i")]);
- l. if the control device is employed intermittently, the monthly volume weighted VOC content, in pounds per gallon of solids applied, (the summation of: {"See section A.III.2.g" + "j"} / {"See section A.III.2.i + "h"});
- m. if the control device is employed intermittently, the monthly volume weighted VOC content, in kilograms per liter of solids applied, (the summation of: ("l" x 0.1198));
- n. if the control device is employed continuously, the monthly volume weighted VOC content, in pounds per gallon of solids applied, (the summation of: ("f" / "h")); and
- o. if the control device is employed continuously, the monthly volume weighted VOC content, in kilograms per liter of solids applied, (the summation of: ("n" x 0.1198)).

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6. The permittee shall maintain the following monthly information:
 - a. the total combined emissions, in tons per month, (the summation of: (Section A.III.1.f + Section A.III.2.m + Section A.III.3.j));
 - b. the rolling, 12-month total combined VOC emissions, in tons per rolling 12-month period, (the summation of: (total individual VOC emitted, in tons, for the current month ("a") plus the total amount of VOC emissions for the 11 previous calendar months));
 - c. if the control device was employed intermittent during the month, the monthly volume weighted average VOC content of the coating employed, in pounds per gallon of applied solids, (the summation of: [{"Section A.III.2.m"+"Section A.III.3.j"}] x 2000 lbs/ton] / ("Section A.III.2.k"+"Section A.III.3.h")); and
 - d. if the control device was employed intermittent during the month, the monthly volume weighted average VOC content of the coating employed, in kilograms per liter of applied solids, (the summation of: ("c" x 0.1198))

7. Until ten years after this emissions unit resumes regular operations after the modifications that are covered under this permit are completed, the permittee shall maintain the following monthly records on the overall volatile organic compound (VOC) emissions changes due to the specific modifications within this permit to this emissions unit and all secondary effected emissions units*:
 - a. the name and Ohio EPA identification of effected emissions unit (effected emissions units are those emissions units the are modified as part of this permit to install or effectively "debottlenecked" to increase emissions);
 - b. the physical change or change in the method of operation, due to the modifications in this permit to install (example: increased 30 hours of operations of a 10 MMBTU/hr natural gas-fired boiler per month (0.3 MM standard cubic feet of natural gas usage increase per month));
 - c. the emissions factor employed and bases (example: 5.5 lbs of VOC/ MM standard cubic feet of natural gas fired, AP-42, Table 1.4-2);
 - d. the calculated VOC emission increase due to this permit to install, in tons per month, (example: [{"b" x "c"}] / 2000 lbs/ton - actual baseline emissions for 1998 and 1999*]);

Emissions Unit ID: K002

- e. the combined monthly VOC emission change due to specific modification from all effected emissions units, in tons per month; and
- f. the rolling, 12-month total combined VOC change emissions, in tons per rolling 12-month period, (the summation of: (total individual VOC emission change, in tons, for the current month ("e") plus the total amount of VOC emissions for the 11 previous calendar months)).

* The VOC baseline emissions are established on the 24 month operational period of Jan.1, 1998 through Dec. 31, 1999. Based on this facilities Title V emission fee report, the overall combined 24 month VOC emissions from emissions units B009, B010, K001, K002, and P010, was 485.37 tons, which gives an annualized based line VOC emission of 242.69 tons. With the permittee's requested 37.65 tons of VOC per rolling 12-month period, Actual Projected Maximum Increase, the OAC rule 3745-31-10(C)(3) allowable VOC for the ten years following the return to normal operations will be 280.34 tons per rolling 12-month period.

- 8. Until ten years after this emissions unit resumes regular operations after the modifications that are covered under this permit are completed, the permittee shall maintain the following monthly records on the overall nitrogen oxides (NOx) emissions changes due to the specific modifications within this permit to this emissions unit and all secondary effected emissions units*:
 - a. the name and Ohio EPA identification of effected emissions unit (effected emissions units are those emissions units the are modified as part of this permit to install or effectively "debottlenecked" to increase emissions);
 - b. the physical change or change in the method of operation, due to the modifications in this permit to install (example: increased 30 hours of operations of a 10 MMBTU/hr natural gas-fired boiler per month (0.3 MM standard cubic feet of natural gas usage increase per month));
 - c. the emissions factor employed and bases (example: 100 lbs of NOx/ MM standard cubic feet of natural gas fired, AP-42, Table 1.4-1);
 - d. the calculated NOx emission increase due to specific modification, in tons per month, (example: [("b" x "c") / 2000 lbs/ton - actual baseline emissions for 1998 and 1999*]);
 - e. the calculated NOx emissions from the increased VOC's being combusted in the thermal incinerator;
 - f. the combined monthly NOx emission change due to specific modification from all effected emissions units, in tons per month; and
 - g. the rolling, 12-month total combined NOx change emissions, in tons per rolling

Emissions Unit ID: K002

Issued: To be entered upon final issuance

12-month period, (the summation of: (total individual NOx emission change, in tons, for the current month ("e") plus the total amount of NOx emissions for the 11 previous calendar months)).

* The NOx baseline emissions are established on the 24 month operational period of Jan.1, 1998 through Dec. 31, 1999. Based on this facilities Title V emission fee report, the overall combined 24 month NOx emissions from emissions units B009, B010, K001, K002, and P010, was 37.85 tons, which gives an annualized based line VOC emission of 18.93 tons. With the permittee's requested 21.50 tons of VOC per rolling 12-month period,

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Actual Projected Maximum Increase, the OAC rule 3745-31-10(C)(3) allowable NO_x for the ten years following the return to normal operations will be 40.43 tons per rolling 12-month period.

9. When determining compliance with 40 CFR Part 60, Subpart TT using continuous or intermittent use of the thermal oxidizer, the permittee shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance per 40 CFR 60.464(c) as described below:
 - a. The temperature monitoring device shall have an accuracy of $\pm 2.5^{\circ}\text{C}$ or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater.
 - b. Each owner or operator shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in the thermal oxidizer used to control emissions from an affected facility remains more than 28°C (50°F) below the temperature at which compliance with 40 CFR Part 60, Subpart TT was demonstrated during the most recent measurement of oxidizer efficiency required by 40 CFR 60.8. The records required by 40 CFR 60.7 shall identify each such occurrence and its duration.
10. When determining compliance with 40 CFR Part 63, Subpart SSSS using continuous or intermittent use of the thermal oxidizer, the permittee shall install, operate, monitor and inspect each monitoring, capture and control device as described below to comply with 40 CFR Part 63, Subpart SSSS:
 - a. Temperature monitoring of oxidizer per 40 CFR 63.5150(a)(3) and Table 1 to 40 CFR Part 63, Subpart SSSS. The permittee shall comply with the following:
 - i. install , calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every 3 months; or the chart recorder, data logger, or temperature indicator shall be replaced. The permittee shall replace the equipment either if the permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly. Each temperature monitoring device shall be equipped with a continuous recorder. The device shall have an accuracy of ± 1 percent of the temperature being monitored in degrees Celsius, or ± 1 degrees Celsius, whichever is greater;

Emissions Unit ID: K002

- ii. install the thermocouple or temperature sensor in the combustion chamber at a location in the combustion zone; and
 - iii. reduced the data to 3-hour block averages.
 - b. Capture system monitoring per 40 CFR 63.5150(a)(4). The permittee shall develop a capture system monitoring plan containing the information specified in paragraphs (i.) and (ii.) of this section. The permittee shall monitor the capture system in accordance with paragraph (iii.) of this section. The permittee shall make the monitoring plan available for inspection by the permitting authority upon request.
 - i. The monitoring plan shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures.
 - ii. The plan also shall specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with the standards in sections A.I.1 and A.I.2. The operating limits shall represent the conditions indicative of proper operation and maintenance of the capture system.
 - iii. The permittee shall conduct monitoring in accordance with the plan.
- 11. Pursuant to 40 CFR 63.5190(a)(1), the permittee shall maintain records on which 40 CFR Part 63, Subpart SSSS compliance option was used and the time periods (beginning and ending dates and times) each option was used on K002.
- 12. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, using coatings that individually meet the organic HAP emission limits as-purchased, to which the permittee will not add HAP during distribution or application, the permittee shall calculate the following:
 - a. The as-purchased, organic HAP to solids ratio of coating material for each coating material applied (H_p) during the 12-month period using the following equation:

$$H_p = (\text{Chi} \times D_i) / V_{si}$$

where:

H_p = the hazardous air pollutant to solids ratio of the coating materials, as purchased;

Chi = organic HAP content of coating material (kg/kg);

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Di = density of coating material (kg/l); and
Vsi = volume fraction of solids in coating (l/l).

- b. The affected source is in compliance if the as-purchased organic HAP to solids ratio of coating material for each coating material applied on K002 (Hp) during the 12-month period is less than or equal to 0.046 kg/l of solids applied.
13. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, using "as-applied" compliant coatings, average organic HAP content on the basis of solids applied for each coating material applied, during the 12-month period, the permittee shall determine the organic HAP emission rate according with the requirements of 40 CFR Part 63, Subpart SSSS and shall maintain the following monthly information:
- a. the name and identification number of each coating and any added solvent(s);
 - b. the organic HAP content of each coating add any added solvent(s) employed, in pounds per gallon of coating, as applied;
 - c. the total amount of each coating add any added solvent(s) employed, in gallons per month;
 - d. the monthly organic HAP emissions from each coating and any added solvent(s) employed, in pounds per month, (the summation of: ("b" x "c"));
 - e. the solids content of each coating and any added solvent(s) employed, in percent by volume;
 - f. the amount of solids applied from each coating and any added solvent(s) employed, in gallons per month, (the summation of: ("c" x "e"));
 - g. the rolling, 12-month total combined organic HAP emissions from each coating and any added solvent(s), in pounds per rolling 12-month period, (the summation of: (total combined organic HAP emitted, in pounds, for the current month ("d") plus the total amount of organic HAP emissions for the 11 previous calendar months));
 - h. the rolling, 12-month total combined solids applied from each coating and any added solvent(s), in gallons per rolling 12-month period, (the summation of: (total solids applied, in gallons, for the current month ("f") plus the total amount of solids applied for the 11 previous calendar months));

Emissions Unit ID: K002

- i. the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids, for each coating and any added solvent(s), in pounds per gallon, (the summation of: ("i" / "j")); and
 - j. the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids, for each coating and any added solvent(s), in kilograms per liter, (the summation of: ("k" x 0.1198)).
14. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, when using the average organic HAP content on the basis of solids applied of all coating material applied, the permittee shall calculate the organic HAP emission rate according to either paragraph the requirement of 40 CFR Part 63, Subpart SSSS and shall maintain the following monthly information:
- a. the name and identification number of each coating and solvent;
 - b. the organic HAP content of each coating and solvent employed, in pounds per gallon of coating, as applied;
 - c. the total amount of each coating and solvent employed, in gallons per month;
 - d. the monthly organic HAP emissions from each coating and solvent employed, in pounds per month, (the summation of: ("b" x c));
 - e. the combined total organic HAP emissions from all coatings and solvent employed, in pounds per month (the summation of: (combined total of all "d's"));
 - f. the solids content of each coating and solvent employed, in percent by volume;
 - g. the amount of solids applied from each coating and solvent employed, in gallons per month, (the summation of: ("c" x "f"));
 - h. the combined total solids applied from all coating and solvent employed, in gallons per month, (the summation of: (combined total of all "g's"));
 - i. the rolling, 12-month total combined organic HAP emissions, in pounds per rolling 12-month period, (the summation of: (total combined organic HAP emitted, in pounds, for the current month ("e") plus the total amount of organic HAP emissions for the 11 previous calendar months));
 - j. the rolling, 12-month total combined solids applied, in gallons per rolling 12-month period, (the summation of: (total solids applied, in gallons, for the current month ("h") plus the total amount of solids applied for the 11 previous calendar months));
 - k. the rolling, 12-month volume weighted organic HAP emissions per volume of

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- applied solids, in pounds per gallon, (the summation of: ("i" / "j")); and
- i. the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids, in kilograms per liter, (the summation of: ("k" x 0.1198)).
15. When determining compliance with 40 CFR 63, Subpart SSSS, Option SSSSe, using only always-controlled work stations vented the thermal oxidizer, the permittee shall calculate the organic HAP emission rate according to either paragraph the requirement of 40 CFR Part 63, Subpart SSSS and shall maintain the following monthly information:
- a. the identification of each work station employed;
 - b. the name and identification number of each coating and solvent employed, in each work station employed;
 - c. the organic HAP content of each coating and solvent employed, in pounds per gallon of coating, as applied;
 - d. the total amount of each coating and solvent employed, in each work station employed, in gallons per month;
 - e. the monthly organic HAP generated from each coating and solvent employed, at each work station employed, in pounds per month, (the summation of: ("c" x "d"));
 - f. the overall capture and control reduction for each employed work station, in percent reduced, (the summation of: (Percent capture for the specific work station x the Percent reduced of the employed control device on the specific work));
 - g. the controlled organic HAP emissions from each work station employed, in pounds per month, (the summation of: ["e" x (1-"f")];
 - h. the total controlled organic HAP emissions from all employed work stations, in pounds per month, (the summation of: (combined total of all "g's"));
 - i. the solids content of each coating and solvent employed, in percent by volume;
 - j. the amount of solids applied from each coating and solvent employed, in gallons per month, (the summation of: ("d" x "i"));
 - k. the combined total solids applied from all coating and solvent employed, in

Emissions Unit ID: K002

- g. the rolling, 12-month total combined organic HAP emissions, in pounds per rolling 12-month period, (the summation of: (total combined controlled HAP emitted, in pounds, for the current month ("e") plus the total amount of HAP emissions for the 11 previous calendar months));
 - h. the rolling, 12-month total combined solids applied, in gallons per rolling 12-month period, (the summation of: (total solids applied, in gallons, for the current month ("f") plus the total amount of solids applied for the 11 previous calendar months));
 - i. the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids, in pounds per gallon, (the summation of: ("g" / "h")); and
 - j. the rolling, 12-month volume weighted organic HAP emissions per volume of applied solids, in kilograms per liter, (the summation of: ("i" x 0.1198)).
17. The permittee shall maintain the following monthly information of the amount of VOC's vented and combusted by the thermal oxidizer:
- a. the total amount of VOC's generated from the coating processes and vented to the thermal oxidizer, in pounds per month;
 - b. the VOC density, in pounds per gallon;
 - c. the amount of VOC's generated and vented to the thermal oxidizer, in gallons per month,(the summation of:("a" / "b"));
 - d. the calculated monthly emissions rate of each criteria pollutants, based on the above calculated gallons per month and the emissions factors from AP-42, Chapter 1.5, "*Liquefied Petroleum Gas Combustion*", Table 1.5-1, for Industrial Boilers and the combustion of Butane*;
 - e. the gross heat value of the VOC's vented to the thermal incinerator, in British thermal units (BTU's) per gallon of VOC;
 - f. the total amount of BTU's generated per month from the VOC's combusted;
 - g. the reduction of natural gas usage in the thermal oxidizer due to the combustion of the VOC's, in cubic feet per month, (the summation of: ("f" / (1020 BTU's/ cubic feet of natural gas)));
 - h. the calculated monthly emission reduction of each criteria pollutant from the reduced natural gas usage, based on above calculated cubic feet per month reduction in natural gas usage and the emissions factors in AP-42, Chapter 1.4, "*Natural Gas Combustion*";

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- i. the overall change in each criteria pollutant, in tons per month, (the summation of: $[(\text{"d"} - \text{"h"}) / (2000 \text{ lbs/ton})]$); and
- j. the rolling, 12-month total change in each criteria pollutant, in tons per rolling 12-month period, (the summation of: (overall change, in tons, for the current month ("i") plus the overall change in for the 11 previous calendar months, for each criteria pollutant)).

* The emissions factors from AP-42, Chapter 1.5, "*Liquefied Petroleum Gas Combustion*" are the best available data for the type of combust available to this office at this time. When better emissions factors are established through emissions testing and/or Guidance, the new emission factors will replace AP-42 Chapter 1.5 emission factors.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. Volatile organic compound (VOC) emissions from the coating operation, including solvent cleanup activities, exceed 425.51 tons per rolling 12-month period.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall submit deviation (excursion) reports in accordance with the requirements of 40 CFR Part 60 Subpart TT and 40 CFR Part 63 Subpart SSSS.
4. Until tens years after this emissions unit is modified and resumes regular operations, the permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. The combined NO_x emissions increase from this modification to this emissions unit and secondary changes are equal or exceed 40.00 tons per rolling 12-month period, as compared to the baseline NO_x emissions as established during the 1997 and 1998 operational years.

Emissions Unit ID: K002

- b. The combined VOC emissions increase from this modification to this emissions unit and secondary changes are equal or exceed 40.00 tons per rolling 12-month period, as compared to the baseline VOC emissions as established during the 1997 and 1998 operational years.
5. The permittee shall submit quarterly summaries of the following records:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

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.

6. The permittee shall submit the reports specified in the following paragraphs to the Ohio EPA, Southwest District Office and U.S. EPA Region V per 40 CFR 63.5180(a) - (f):
 - a. The permittee shall submit an initial notification required in 40 CFR 63.9(b) and 40 CFR 63.5180(b).
 - b. The permittee shall submit a Notification of Performance Test as specified in 40 CFR 63.7 and 63.9(e) if the permittee is complying with the emission standard using a control device. This notification and the site-specific test plan required under 40 CFR 63.7(c)(2) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The permittee may consider the operating parameter identified in the site-specific test plan to be approved unless explicitly disapproved, or unless comments received from the Administrator require monitoring of an alternate parameter.
 - c. The permittee shall submit a Notification of Compliance Status as specified in 40 CFR 63.9(h). The permittee shall submit the Notification of Compliance Status no later than 30 calendar days following the end of the initial 12-month compliance period described in 40 CFR 63.5130.
 - d. The permittee shall submit start-up, shutdown, and malfunction reports as specified in 40 CFR 63.10(d)(5) if a control device is used to comply with 40 CFR 63, Subpart SSSS.
 - i. If actions during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not

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completely consistent with the procedures specified in the source's start-up, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the permittee shall state such information in the report. The start-up, shutdown, or malfunction report will consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy, that will be submitted to the Administrator.

- ii. Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph A.IV.2.
7. The permittee shall submit semi-annual compliance reports in the following manner:
- a. Compliance report due dates are as follows per 40 CFR 63.5130(a) and 63.5180(g)(1):
 - i. The first semiannual reporting period begins on July 1, 2006 and ends on December 31, 2006.
 - ii. The first semiannual compliance report shall cover the first semiannual reporting period and be postmarked or delivered no later than January 30, 2007.
 - iii. Each subsequent compliance report shall cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
 - iv. Each subsequent compliance report shall be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
 - v. For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (i) through (iv) of term A.IV.2(a).
 - b. The semi-annual compliance report shall contain the following information per 40 CFR 63.5180(g)(2) and 63.5180(h):

Emissions Unit ID: K002

- i. Company name and address.
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.
 - iii. Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
 - iv. Identification of the compliance option(s) specified in Table 1 of 40 CFR 63.5170 that the permittee used on each coating operation during the reporting period. If the permittee switched between SSSS-Option A and SSSS-Option B during the reporting period, the permittee must report the beginning dates for each compliance option.
 - v. A statement that there were no deviations from the standards during the reporting period.
 - vi. The total operating time of each affected source during the reporting period.
 - vii. Information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable, and the corrective action taken.
 - viii. Information on the number, duration, and cause for monitor downtime incidents (including unknown cause other than downtime associated with zero and span and other daily calibration checks, if applicable).
8. The permittee shall submit annual reports which specify the total organic compound, carbon monoxide, and nitrogen oxide emissions from this emissions unit. Annual emission reports may be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:

14.62 lb NO_x /hr nor 64.05 tons per rolling 12-month period; and
6.33 lb CO/hr nor 27.71 tons per rolling 12-month period.

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Applicable Compliance Method:

The hourly allowable emission limitation for CO was established by multiplying the combined maximum natural gas usage rate (61,176 cu.ft/hr) by the CO emission factor from AP-42, Table 1.4-1, revised 7/98 (84 lbs CO/mm cu. ft) and the CO emitted and combusted from the VOC's vented to the control device.

The hourly allowable emission limitation for NO_x was established by multiplying the maximum natural gas usage rate for the air make-up units (4,902 cu.ft./hr), oven burners (45,490 cu.ft/hr), pretreat oven burners (5,882 cu.ft./hr), and thermal oxidizer (4,902 cu.ft./hr), by the associated NO_x emission factor for that equipment:

*for the air make-up units, 100 lbs NO_x/mm cu. ft. from AP-42, Table 1.4-1, revised 7-98.

*for the oven burners, 24.5 lbs NO_x/mm cu. ft. from the vendor guarantee of 0.024 lbs NO_x/MMBtu of actual heat input.

*for the pretreat oven burners, 102 lbs NO_x/mm cu. ft. from the vendor guarantee of 0.1 lbs NO_x/MMBtu of actual heat input,

*for the thermal oxidizer, 81.6 lbs NO_x/mm cu. ft. from the vendor guarantee of 0.08 lbs NO_x/MMBtu of actual heat input; and

*for the NO_x and CO created by the combustion of the VOC's vented and combusted by the control device.

See Section III.17, for overall emission change from the combustion of VOC vs. Natural gas savings.

** For NO_x, Methods 1 - 4 and 7; and for CO, Methods 1 - 4 and 10.

*** The rolling 12-month limitations are based on the maximum potential of the emissions unit and 8760 hours of operation.

b. Emission Limitation:

VOC emissions from the coating operation, including solvent cleanup activities, shall not exceed 425.51 tons per year.

Alcoa Building Products Inc

DTI Application: 05 14417

Facility ID: 0575010103

Emissions Unit ID: K002

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.4.e, of these terms and conditions.

c. Emission Limitation:

VOC content of the coating employed shall not exceed 2.6 lbs/gallon of coating excluding water and exempt solvents, as the maximum VOC content of each coating or as a daily volume-weighted average.

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Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in Section A.III.2.i, of these terms and conditions.

d. Emission Limitation:

VOC emissions shall not exceed 0.28 kg/liter (2.34 lb/gal) of coating solids applied for each calendar month without the use of the thermal oxidizer or 0.14 kg/liter (1.17 lbs/gal) of coating solids applied for each calendar month with the use of the thermal oxidizer.

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the records required pursuant to sections A.III.2.q.

e. Emission Limitation:

When use of the thermal oxidizer is intermittent, VOC emissions shall not exceed 0.28 kg/liter (2.34 lb/gal) of coating solids applied for each calendar month with intermittent use of the thermal oxidizer.

Applicable Compliance Method:

Compliance with the allowable VOC emission limitations shall be determined through the record keeping requirements established in section A.III.4.i.

f. Emission Limitation:

The permittee shall limit organic HAP emissions to no more than 0.046 kg/liter (0.38 lbs/gallon) of solids applied during each 12-month compliance period.

Applicable Compliance Method:

Compliance with this emission limitations shall be determined through the record keeping requirements based on the appropriate compliance protocol established in section A.III.11.i., A.III.12.i, A.III.13.o, or A.iii.14.j.

2. The permittee shall determine the organic HAP content and the solids content of each

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coating material applied in this emissions unit in accordance with the requirements of 40 CFR 63.5160(b) and (c), respectively.

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. Consistent with U.S. EPA streamlining policy, the permittee may elect upon approval of Ohio EPA to utilize the applicable performance test methods and procedures per 40 CFR Part 63, Subpart SSSS in lieu of the performance test methods and procedures contained in 40 CFR Part 60, Subpart TT. Subpart SSSS performance test methods and procedures are generally more stringent than the performance test methods and procedures of Subpart TT
 - b. The emission testing shall be conducted within 6 months after the issuance of this permit and within 6 months after the resumption of regular operations.
 - c. The test(s) shall be conducted while the emissions units are operating at or near the maximum capacities for collected emissions from this emissions unit (K002), unless otherwise specified or approved by the Ohio EPA, Central District Office.
 - d. The permittee shall conduct, or have conducted, a performance test for each capture and control system to determine the destruction or removal efficiency of each control device according to 40 CFR 63.5160(d) as described in section A.V.2.h, and the capture efficiency of each capture system according to 40 CFR 63.5160(e) as described in section A.V.2.i, while burning natural gas in the curing ovens and collecting emissions from this emissions unit (K002)
 - e. The permittee shall determine the organic HAP weight fraction of each coating material applied by following one of the procedures:
 - i. the permittee may test the material in accordance with Method 311 of appendix A of 40 CFR 63. The Method 311 determination may be performed by the manufacturer of the material and the results provided to the permittee.. The organic HAP content shall be calculated according to the following criteria and procedures:
 - (1) count only those organic HAP that are measured to be present at greater than or equal to 0.1 weight percent for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and greater than or equal to 1.0 weight percent for other organic HAP compounds;

Emissions Unit ID: K002

- (2) express the weight fraction of each organic HAP counted according to subparagraph (2). of this section as a value truncated to four places after the decimal point (for example, 0.3791); and
 - (3) calculate the total weight fraction of organic HAP in the tested material by summing the counted individual organic HAP weight fractions and truncating the result to three places after the decimal point (for example, 0.763);
 - ii. for coatings, the permittee may determine the total volatile matter content as weight fraction of non-aqueous volatile matter and use it as a substitute for organic HAP, using Method 24 of 40 CFR 60, appendix A. The Method 24 determination may be performed by the manufacturer of the coating and the results provided to the permittee;
 - iii. the permittee may use an alternative test method for determining the organic HAP weight fraction once the Administrator has approved it. The permittee shall follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval; and
 - iv. the permittee may use formulation data provided that the information represents each organic HAP present at a level equal to or greater than 0.1 percent for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and equal to or greater than 1.0 percent for other organic HAP compounds in any raw material used, weighted by the mass fraction of each raw material used in the material. Formulation data may be provided by the manufacturer of the coating material. In the event of any inconsistency between test data obtained with the test methods specified in paragraphs (i) through (iii) of term A.V.2.e and formulation data, the test data will govern.
- g. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings.
- h. The permittee shall determine the solids content of each coating material applied. The permittee may determine the volume solids content using ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 (incorporated by reference, see 40 CFR 63.14), or an EPA approved alternative method. The ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 determination may be performed by the manufacturer of the material and the results provided to the permittee. Alternatively, the permittee may rely on formulation data provided by material providers to determine the volume solids.
- i. The permittee shall conduct, or have conducted, a performance test to establish the destruction or removal efficiency of the control device or the outlet VOC

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concentration achieved by the oxidizer, according to the methods and procedures in Methods 1 through 4 and 25 or 25A, 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- j. The permittee shall determine the capture efficiency of the enclosure on the coating operation by one of the following procedures:
 - i. for an enclosure that meets the criteria for a PTE, the permittee may assume it achieves 100 percent capture efficiency. The permittee must confirm that the capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40 CFR 51, Appendix M (or an EPA approved alternative method), and that all exhaust gases from the enclosure are delivered to a control device;
 - ii. the permittee may determine capture efficiency, CE, according to the protocols for testing with temporary total enclosures that are specified in Method 204A through F of 40 CFR 51, Appendix M. The permittee may exclude never-controlled work stations from such capture efficiency determinations; and
 - iii. as an alternative to the procedures specified in paragraphs (i)(i) and (ii) of this section, if a capture efficiency test is required, the permittee may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective or the Lower Confidence Limit approach as described in Appendix A to 40 CFR 63, Subpart KK. The permittee may exclude never-controlled work stations from such capture efficiency determinations.

- k. During the performance test specified in paragraph (i) of this section, the permittee shall monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. The permittee shall monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs. The permittee shall use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for the thermal oxidizer for purposes of 40 CFR Part 63, Subpart SSSS. This average combustion temperature minus 50 degrees Fahrenheit is the minimum operating limit for the thermal oxidizer for purposes of 40 CFR Part 60, Subpart TT.

Emissions Unit ID: K002

4. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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.

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

Emissions Unit ID: K002

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VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment -(K002) - 54 inch Coil Coating Line with pretreat coater and curing ovens controlled with a thermal incinerator

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None