☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **05-06270**

A. Source Description

The facility is a manufacturer of automotive and decorative parts employing stamping presses and coating lines to produce their products. The emission unit subject to this PTI modification is a coating line (K022) on the decorative parts side of the operation. This permit to install limits VOC emissions as part of American Trim's overall effort to avoid PSD.

B. Facility Emissions and Attainment Status

Given the enforceable limitation on VOC emissions for this and other units from other PTI applications, the facilities annual emissions of VOC will total 192.5 tons per year. The facility is located in Shelby County, which is in attainment status for Ozone, as well as all other criteria pollutants.

C. Source Emissions

This unit is limited to 18.895 tons per rolling 12-month period. The limitation on emissions requires monthly record keeping of all coatings and cleanup materials employed, their associated VOC content, and the calculated VOC emissions (assuming 100% emissions) per rolling 12-month period.

D. Conclusion

The limitation on total VOC emissions from this emission unit is a part of American Trims's facility-wide plan to limit VOC emissions and stay under the emission thresholds for PSD.

State of Ohio Environmental Protection Agency

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

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 05-06270
Fac ID: 0575010106

DATE: 9/9/2004

American Trim L.L.C.
Kimberly Ness
1501 W Michigan Ave
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, 43266-0149.

A Permit to Install may be issued in proposed of 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 **$200** 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

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

CC: **USEPA** **SWDO** **IN**

SHELBY COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **05-06270** FOR AN AIR CONTAMINANT SOURCE FOR
American Trim L.L.C.

On 9/9/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **American Trim L.L.C.**, located at **1501 W Michigan Ave, Sidney**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 05-06270:

One 8-screen unit topcoat line - modification.

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.

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

DRAFT PERMIT TO INSTALL 05-06270

Application Number:	05-06270
Facility ID:	0575010106
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	American Trim L.L.C.
Person to Contact:	Kimberly Ness
Address:	1501 W Michigan Ave Sidney, OH 45365

Location of proposed air contaminant source(s) [emissions unit(s)]:
1501 W Michigan Ave
Sidney, Ohio

Description of proposed emissions unit(s):
One 8-screen unit topcoat line - modification.

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

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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 reports shall be submitted quarterly, i.e., 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 to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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. 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.

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 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 reissuance, or modification, or for denial of a permit renewal application.

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

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

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

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 this Permit To Install.

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 of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

shall not be federally enforceable and shall be enforceable under State law only.

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.

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 To Install 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.

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

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install 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 quarterly, i.e., 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. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of 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)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

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., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

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

Pollutant	Tons Per Year
VOC	18.895 + 0.11 (oven)
SO2	0.34 (oven)
CO	1.67 (oven)
NOx	3.10 (oven)
PM	0.15 (oven)

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

Provided the facility meets the definition of an affected source as defined in §§63.3881 and 63.3882 of 40 CFR Part 63, Subpart MMMM (MACT MMMM)**,** the emissions units subject to MACT MMMM shall comply with the requirements of MACT MMMM by the compliance date of January 2, 2007. In addition, the facility would be subject to the applicable portions of the MACT General Provisions (Subpart A) and any other subparts referenced within the terms of Subparts MMMM and A. Subparts MMMM and A are reproduced in their entirety within the facility-wide portion of the permit to install for emission unit K033 (PTI 05-06273).

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	Applicable Rules/Requirements
K022 - Printing Coating Line 172 (was 348A) - Modification	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-10(B)
	OAC rule 3745-21-09(U)(2)(f)
	OAC rule 3745-21-09(U)(1)
	40 CFR Part 63, Subpart MMMM
	OAC rule 3745-31-05(C)

Applicable Emissions Limitations/Control Measures	
The emissions from natural gas and propane combustion in the drying ovens shall not exceed the following: 0.71 lb/hr and 3.1 tons/yr NOx; 0.38 lb/hr and 1.67 tons/yr CO; 0.04 lb/hr and 0.15 ton/yr filterable PM; 0.08 lb/hr and 0.34 ton/yr SO2; and 0.03 lb/hr and 0.11 ton/yr VOC.	See Part II.A of this permit.
The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C), OAC rule 3745-21-09(U)(1), and OAC rule 3745-17-10(B).	Volatile Organic Compound (VOC) emissions from coatings, and pan and cleanup materials shall not exceed 18.895 tons VOC per rolling 12 month period.
See A.2.b and A.2.c, below.	See B.3
0.02 lb PE per mmBtu for the drying oven	
VOC content of non-compliant extreme performance coatings shall not exceed 5.36 lbs VOC/gallon, as applied minus water and exempt solvents	
See A.2.a and A.2.b, below.	
See A.2.d., below.	

2. Additional Terms and Conditions

2.a Pursuant to OAC rule 3745-21-09(U)(2)(f), the best available technology has been determined to be extreme performance coatings that have a VOC content greater than the limitations of OAC rules 3745-21-09(U)(1)(c).

2.b This facility shall, on an ongoing basis, evaluate the availability of an alternate coating and coating method that will reduce the emissions from this source and meet the coating specifications of the desired product. Should an alternate coating and/or coating method become available, as based on the Best Available Technology (BAT) for this type of operation, this facility shall submit a schedule for implementation of the alternate coatings and/or coating method within 30 days of the availability.

This facility shall submit quarterly reports that summarize the evaluation of an alternate coating and coating method which details the following information for each coating and/or coating method evaluated:

i. The VOC content, in pounds per gallon;
ii. The acceptability;
iii. The reason why the alternative coating does not meet specification, for unacceptable coatings;
iv. The expected reduction in VOC emissions from the utilization of the acceptable alternate coatings; and
v. The cost of modifying the source to utilize the alternate coatings and/or coating method.

These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).

Once the facility employs coatings in compliance with the requirements of OAC rule 3745-21-09(U)(1) in this source, the evaluation process of alternate coatings and the reporting requirement of this term will be discontinued.

2.c The emission limitations for PM10, SO2, NOx, CO and VOC from combustion of natural gas and/or propane in the drying ovens is established to reflect potential to emit for this emissions unit. Therefore, record keeping and reporting requirements are not necessary to ensure compliance with these limits.

2.d Extreme performance coatings are exempted by the BAT determination in this permit and the exemption under OAC rule 3745-21-09(U)(2)(f) in this permit

to install from the requirements for extreme performance coatings in OAC rule 3745-21-09(U)(1). If at any time a non-extreme performance coating is used in K048, that coating must comply with the requirements of OAC rule 3745-21-09(U)(1).

For the purposes of discontinuing the coating evaluation in A.2.b, the VOC content of compliant extreme performance coatings shall not exceed 3.5 lbs VOC/gallon, as applied minus water and exempt solvents.

II. Operational Restrictions

1. The permittee shall burn only natural gas or propane in this emission unit.

2. As of the applicable compliance date from 40 CFR Part 63, Subpart MMMM, the permittee shall employ all applicable operating limits and work practice standards detailed in §§63.3892 and 63.3893 of that subpart, provided the facility meets the definitions of an affected source as defined in §§63.3881 and 63.3882 of 40 CFR Part 63, Subpart MMMM..

3. The weight of volatile organic materials applied/used for K022 shall not exceed 18.895 tons of per rolling 12 months, calculated using the following formula:

$$18.895 \text{ tons VOC} \geq \sum_{n=1}^{i} \frac{(P_i)(VOC_i)[1 - (capture*DRE)]}{2000 \text{ lbs/ton}} - \frac{(P_o)(VOC_o)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of coating or pan/cleanup solvent *i* in gallons for the last 12 months

VOC_i = volatile Organic compound content of coating *i* or pan/cleanup solvent *i* in pounds VOC per gallon.

P_o = recovered pan/cleanup solvent *o* in gallons for the last 12 months

VOC_o = volatile Organic compound content of pan/cleanup material *o* in pounds VOC per gallon.

capture = the capture efficiency, assumed to be 0%

DRE = destruction removal efficiency of any control device, 0% without controls

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months after issuance of this permit.

III. Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number of each coating, and cleanup/pan solvent material, as applied;

b. the VOC content of each coating, minus water and exempt solvents, as applied;

c. the VOC content of each cleanup/pan solvent material employed;

d. the volume in gallons of each coating employed;

e. the volume in gallons of each cleanup/pan solvent material employed;

f. the monthly VOC emissions from the coatings, and cleanup/pan solvent materials employed, i.e., multiply the monthly volume, in gallons, of each coating and cleanup/pan solvent material employed by its respective VOC content less water and exempt solvents, and summarize the results;

g. the rolling, 12 month usage summation for coatings, and cleanup/pan solvent materials employed;

h. the rolling, 12 month summation of VOC emissions from the coating, and cleanup/pan solvent material employed, prior to any credit for recovered materials; and

i. if a credit from recovered materials is applied, the rolling, 12 month summation of VOC emissions from the coating, ink, and cleanup/pan solvent material employed, less the total emissions credit from recovered materials shipped during the 12 month period (Section III.1.j - Section III.2.e).

2. If a credit for recovered cleanup/pan solvent material is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered cleanup/pan solvent material, and the recovery drum or tank serving this emissions unit:

a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;

b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;

c. a record of the VOC content of each cleanup/pan solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;

d. the mass (lbs) of VOC to be credited to the rolling, 12 month emissions summation, from

each shipment of recovered material, calculated using the lowest VOC content of any cleanup/pan solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit; and

e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the rolling 12 month period.

3. For each day during which the permittee burns fuel other than natural gas or propane in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

4. As of the applicable compliance date from 40 CFR Part 63, Subpart MMMM, the permittee shall collect and keep all applicable records of the data and information detailed in §63.3930 of that subpart in the manner detailed in §63.3931 of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.3881 and 63.3882 of 40 CFR Part 63, Subpart MMMM..

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any monthly record showing the use of noncomplying coatings and/or cleanup/pan solvent material. These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month emission limitation for volatile organic compounds from coatings and pan/cleanup materials of 18.895 tons.

   These quarterly deviation (excursion) reports shall be submitted in accordance with Part I - General Terms and Conditions A.1.c.

3. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) of any ~~daily~~ record showing the use of a fuel other than natural gas or propane was burned in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days following the end of the calendar month.

4. As of the applicable compliance dates from 40 CFR Part 63, Subpart MMMM, the permittee shall submit all applicable reports and notifications detailed in §§63.3910 and 63.3920 of that subpart,

provided the facility meets the definitions of a subject affected source as defined in §§63.3881 and 63.3882 of 40 CFR Part 63, Subpart MMMM..

V. Testing Requirements

1. Emission Limitation:
   Volatile Organic Compound (VOC) emissions from coatings, and pan and cleanup materials shall not exceed 18.895 tons VOC per rolling 12 month period.

Applicable Compliance Method:
Compliance with the above term shall be demonstrated through the record keeping requirements in section III of this emission unit. VOC emissions from coatings and pan/cleanup materials shall be calculated using the following formula:

2. Emission Limitation:
VOC content of coatings shall not exceed 5.36 lbs VOC/gallon, as applied

Applicable Compliance Method:
Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings. The record keeping requirements contained in Section III.1 shall demonstrate that only materials with these VOC content limitations are applied.

3. Emission Limitation:
The emissions from natural gas and propane combustion in the drying ovens shall not exceed the following:

0.71 lb/hr and 3.1 tons/yr NOx;
0.38 lb/hr and 1.67 tons/yr CO;
0.04 lb/hr and 0.15 ton/yr filterable PM;
0.08 lb/hr and 0.34 ton/yr SO2; and
0.03 lb/hr and 0.11 ton/yr VOC.

Applicable Compliance Method:
Compliance with the limits for natural gas combustion within the drying ovens shall be based upon the emission factors from AP-42 "Compilation of Air Pollutant Emission Factors", Tables 1.4-1 and 1.4-2 (7/98). These emission factors (lb pollutant/10^6 scf) multiplied by the maximum hourly gas burning capacity of the burners (one at 1.75 mmBtu/hr, one at 1 mmBtu/hr, and six at 0.3125 mmBtu/hr) and times 1 scf/1000 Btu shall be the demonstration of compliance with the hourly limits. Compliance with the ton per year limits are documented by multiplying the calculated hourly limits by 8760 hours in a year and dividing by 2000 pounds.

Compliance with the limits for propane combustion within the drying ovens shall be based upon the emission factors from AP-42 "Compilation of Air Pollutant Emission Factors", Tables 1.5-1 (10/96) These emission factors (lb pollutant/10^3 gallons) multiplied by the maximum hourly gas burning capacity of the burners (one at 1.75 mmBtu/hr, one at 1 mmBtu/hr, and six at 0.3125 mmBtu/hr) and divided by the 91.5 MMBtu/10^3 gallons shall be the demonstration of compliance with the hourly limits. Compliance with the ton per year limits are documented by multiplying the calculated hourly limits by 8760 hours in a year and dividing by 2000 pounds.

4. Emission Limitation:

0.02 lb PE per mmBtu for the drying oven

Applicable Compliance Method:
Compliance with this limit shall be based upon the requirement for burning only natural gas or propane for this emissions unit. If required, the permittee shall demonstrate compliance with this emissions limitation through a compliance demonstration performed in accordance with 40 CFR Part 60, Appendix A, Method 1 thru 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

5. Emission Limitation:
The permittee is subject to the HAP content limitations detailed in 40 CFR Part 63, Subpart MMMM §63.3890 as of the applicable compliance date detailed in that subpart.

Applicable Compliance Method:
As of the applicable compliance date from 40 CFR Part 63, Subpart MMMM, the permittee shall demonstrate compliance using the applicable methods detailed in §63.3940 through §63.3968 inclusive, of that subpart, provided the facility meets the definitions of a subject affected source as defined in §§63.3881 and 63.3882 of 40 CFR Part 63, Subpart MMMM..

VI. Miscellaneous Requirements

For purposes of this permit, the following definitions shall apply:

1. "Compliant" extreme performance coatings shall be defined as extreme performance coatings that comply with the VOC content limitation as specified in OAC rule 3745-21-09(U)(1)(c).

2. "Non-compliant" extreme performance coatings shall be defined as extreme performance coatings that do not comply with the VOC content limitation as specified in OAC rule 3745-21-09(U)(1)(c), but comply with the content limitation as determined by OAC rule 3745-21-09(U)(2)(f).

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K022 - Printing Coating Line 172 (was 348A) -Modification	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

1. The permit to install for this emissions unit (K022) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl ethyl ketone (MEK)

TLV (mg/m3): 590 mg/m3

Maximum Hourly Emission Rate (g/sec): 2.97 (facility-wide)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1080

MAGLC (ug/m3): 14,000

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None