

Title V Annual Compliance Certification Example 1

This example is for an early Title V permit issued in 1998 that has since expired. Although the permittee has submitted a renewal application, the permittee must continue to operate in compliance with the provisions of the expired permit and must continue to certify compliance until the permit is renewed.

Items to note:

- 1) The example permit is provided after the example compliance certification.
- 2) The General Terms and Conditions included in the State and Federally Enforceable Section of Part II of the permit do not address revisions and clarifications made in response to concerns and deficiencies raised by the U.S. EPA after the permit was issued (e.g., Ohio EPA reached agreement with U.S. EPA that insignificant emissions units listed in Part II.B that are subject to PTI or generally applicable requirements would be moved to the State and Federally Enforceable Section of Part II of the permit upon modification or renewal).
- 3) All insignificant emissions units in this example permit are listed on the State-Only Enforceable Section of the Title V permit. However, current guidance and rules would require some, if not all, of the insignificant emissions units to be listed on the State and federally Enforceable Section since the insignificant emissions units are subject to applicable requirements. General Term and Condition Part I.A.18 applies to all IEUs.
- 4) The deviations of Part III.A.1 and Part III.A.2.a reported for emissions unit K001 were not reported in accordance with the reporting requirement for the emissions unit established in Part III.A.IV.1.
- 5) Emissions unit Z001 is subject to the visible particulate emission requirements of OAC rule 3745-17-07(A). During 2006 a new operator used the equipment in such a way as to exceed the VE limitation causing a deviation. The permittee also failed to report the deviation. This deviation would have to be addressed through General Term and Condition Part I.A.1.c.ii. which requires the permittee to report deviations of all federally enforceable emission limitations and would have to be addressed through General Term and Condition Part I.A.1.c.ii. which requires insignificant emissions units to comply with all applicable requirements.
- 6) Ohio EPA inspected the facility on 5/17/2006. The inspector noticed opacity coming out of the bake oven stack when she arrived at the facility. The inspector (a certified method 9 reader) performed 20 minutes of opacity readings before entering the facility. Numerous six-minute averages exceeded 20%. The inspector notified the plant manager. The plant manager investigated the cause and took corrective action. The plant manager also made a copy of the observation sheets.

Title V Compliance Certification

A. Facility Name: [Fabricated Metal](#)

B. Facility Address: [1 Competition Way](#)

C. Facility ID [10 digits] : [0812719999](#)

D. Final Title V Permit Issuance Date [Multiple dates should be identified if the permit was modified or renewed during the reporting year]:

02/12/1998			
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E. Reporting Period (usually the preceding calendar year): 2006 Total pages in this Certification: 2

F. Identification of intermittent compliance [add rows as necessary]:

*Identify the Emissions Unit and the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Excursions/Deviations	
		Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Probable Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
Z001 – Part I.A.1.c.ii; 3745-17-07(A)	Method 9		Insignificant emissions unit Z001 - exceeded visible emissions limitations required by generally applicable requirement OAC rule 3745-17-07(A) on 11/15/06. New employee completed training on proper use of equipment.
Part I.A.6.a	N/A		Various deviations as identified or referenced in the compliance certification.
Z001 – Part 1.A.18	N/A		Insignificant emissions unit Z001 - exceeded visible emissions limitations required by generally applicable requirement OAC rule 3745-17-07(A) on 11/15/06. New employee completed training on proper use of equipment and <i>set up procedure to report deviations.</i>
K001 – Part III.A.1; 21-09(U)(1)(c)	USEPA Method 24		On 10/28/06 VOC content exceeded daily, volume-weighted average VOC due to improper mix. Reviewed/revised operator procedures and mix prep protocols.
K001 – Part III.A.2.a; 21-09(U)(1)(c)	USEPA Method 24		On 10/28/06 VOC content exceeded daily, volume-weighted average VOC due to improper mix. Reviewed/revised operator procedures and mix prep protocols.

*Identify the Emissions Unit and the Emission Limitation/Control Measure or the Permit Term No.	Method Used to Determine Compliance	Excursions/Deviations	
		Those Documented Within Excursion/Deviation Reports Submitted to OEPA District Office or Local Air Agency (Identify Date of Each Report)	Other (Explain the Nature, Duration, and Probable Cause of the Excursion/Deviation, As Well As Any Corrective Action Taken)
K001 – Part III.A.IV.1	N/A	01/31/2007	

*For IEUs, include the permit number or SIP-based applicable requirement rule reference

G. Any material information not established through the applicable permit terms and conditions that may indicate non-compliance [add rows as necessary]:

*Identify the Emissions Unit	Description of material information
K001 – Part III.A.1; 17-07(A)	Certified USEPA Method 9 reader observations by Ohio EPA inspector on 5/17/2006. Inspected excess air damper and determined it was stuck partially closed during bake-off. Fixed damper. Developed inspection schedule for damper.

*For IEUs, include the permit number or SIP-based applicable requirement rule reference

H. Certification of Compliance:

Except as indicated in Sections F and G above, all emissions units subject to one or more applicable requirements operated in continuous compliance with all federally enforceable permit terms and conditions throughout the calendar year identified in Section E above.

I, being the individual specified in OAC rule 3745-77-03(D), hereby affirm that every permit term and condition, including every permit term and condition or SIP-approved rule reference for each insignificant emissions unit that is based on an applicable requirement, has been reviewed with respect to intermittent or continuous compliance. I, being the individual specified in OAC rule 3745-77-03(D), hereby affirm that the facility identified in Sections A through C above was in continuous compliance with every permit term and condition during the reporting period, except as specified in Section F and Section G of this certification. I, being the individual specified in OAC rule 3745-77-03(D), hereby affirm that the statements made in this Title V Compliance Certification which I signed on this [day of the month] day of [month], [year] are true, accurate and complete, based on information and belief formed after reasonable inquiry.

Authorized Signature

Date

Name (Please Print or Type)

Title (Please Print or Type)

Title V Compliance Certification Instructions

- A. The Facility ID ten-digit number can be found on the first page of your final Title V permit.
- B. Date of Title V permit issuance can be found on the first page of your final Title V permit
- C. Reporting Period (usually the preceding calendar year): The initial period that you are required to certify compliance for after you have been issued your initial Title V permit is from the date the permit became effective until the end of December of that same year. You are required to certify compliance for the entire preceding calendar year for succeeding years that you are required to operate under a Title V permit or a subsequent Title V permit application shield.
- D. Identify the effective date of your permit. If your permit was modified or renewed during the calendar year for which this certification is being prepared, please identify the effective date of such modification or renewal as well. When certifying compliance with a term that has changed as a result of a permit modification or renewal, please indicate to which version of the permit the certification pertains.
- E. Identify the calendar year that the report covers.
- F. Review your compliance status with every permit term except those permit terms that do not impose any affirmative compliance obligations on the permittee. Review must include those General Terms and Conditions which impose an affirmative obligation of compliance upon the permittee. Intermittent compliance for IEUs identified in Part II.A must identify the applicable PTI, and PTI permit term or SIP-based rule citation.

Identify each deviation. Please note that deviations of applicable requirements for insignificant emissions units must also be identified in this section. Although this section focuses on identifying only those permit terms and conditions where intermittent compliance occurred during the reporting period, ***it is important for you to review every permit term and condition, including applicable PTI permit terms or SIP-based rules for IEUs, to ensure you properly fill this section out.*** Failure to do so could put you at risk for enforcement or citizen suit under the Act.

The general requirement in Part I. A. 6. of the Title V Permit requiring compliance with “all terms and conditions of this permit” applies only to terms and conditions which are both State and federally enforceable. Intermittent compliance with any State and federally enforceable Term or Condition will also require identifying intermittent compliance with General Term and Condition Part I. A. 6.

When identifying the method used to determine compliance, please identify the actual method used. Most times this will be similar or identical to the method established in the permit. However, some permits provide monitoring flexibility, or intermittent compliance may be discovered via a method other than what is specified in the permit; in each case indicate the actual method.

Note: The information identified in this section may be identified in an attachment to this certification (e.g., information tracked in a spreadsheet) as long as the attachment provides the level of detail required by this section. Simply reference the attachment in the first row of the table.

- G. You are required to consider, identify, and address all available additional material information in your annual compliance certification if it does exist, even if the data obtained from monitoring activities required by the permit indicate compliance. Data that indicate possible intermittent compliance must be reported in this section. **The Compliance Certification requirements in Part I.A of your permit require “Such other facts as the Director of the Ohio EPA may require to determine the compliance status of the source”. Part I.A of the permit also requires that any document submitted based on permit requirements (including the compliance certification) include a certification by the responsible official that the information conveyed in the report (or compliance certification) is true and accurate. If credible information indicating intermittent compliance is known to the responsible official and is based on information other than what is required by the permit, it must be identified in order for the responsible official to comply with the signature certification requirements.**

Ohio EPA does not expect this section will be used very often. However, the following examples of “other material information that may indicate non-compliance” may be useful in understanding the type of information that could be identified in Section G.

Example 1:

A permittee is subject to a lb/hr mass limit for particulate emissions. A one-time stack test is the required compliance method for the mass limit. Method 9 opacity readings at a specified frequency are required as ongoing monitoring as an indicator of compliance. All readings taken by the permittee that are above 20% opacity must be reported. A certified smoke reader from U.S. EPA takes readings in accordance with Method 9 that indicate opacity above 20%. U.S. EPA provides a copy of the completed observation sheets as part of a notice of violation sent to the responsible official at the company. The company is not obligated to report the readings as part of the deviation reporting requirements in the permit. However, the responsible official is obligated to identify the readings in Section G of the compliance certification and report them as indicating intermittent compliance with the visible emission limit in the same way that similar readings would have been submitted by the company via the deviation reports.

In the example provided above, if the readings indicated compliance, the information would not need to be identified in Section G. Likewise, if the reader was not certified to take Method 9 readings, the information could be disregarded and would not be identified in Section G, even if the readings indicated high opacity values.

Example 2:

A permittee is subject to a “No Visible Emissions” limit on a six-minute basis for unpaved roadways and parking areas. The permit includes a control requirement to keep the areas adequately wet. A monitoring requirement to conduct monitoring using Method 22 visible emissions readings is included in the permit. A neighbor to the facility takes 15 minute video that clearly indicates the presence of visible emissions. A copy of the video is provided to the company. The company is not obligated to report the visible emissions as part of the deviation reporting requirements in the permit. However, the responsible official is obligated to identify the presence of visible emissions in Section G of the compliance certification and report them as indicating intermittent compliance with the “No VE” limit in the same way that similar readings would have been submitted by the company via the deviation reports.

When identifying the method used to determine compliance, please identify the actual method used. Most times this will be similar or identical to the monitoring method established in the permit. However, some permits provide monitoring flexibility, or intermittent compliance may be discovered via a method other than what is specified in the permit; in each case indicate the actual method.

Note: The information identified in this section may be identified in an attachment to this certification (e.g., information tracked in a spreadsheet) as long as the attachment provides the level of detail required by this section. Simply reference the attachment in the first row of the table.

- H. By signing in Section H, you are certifying that all applicable permit terms and conditions have been evaluated and the facility was in compliance with all applicable permit terms and conditions during the reporting period with the exception of the noted deviations in Sections F and G.

General Instructions

This certification must be post-marked by the certification deadline identified in your current Title V permit. Your filing deadline can be found in the General Terms and Conditions.



State of Ohio Environmental Protection Agency

Street Address:
1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
P.O. Box 1049
Columbus, OH 43216-1049

02/12/98

CERTIFIED MAIL

**RE: Final Title V Chapter 3745-77
permit**

08-12-71-9999
Fabricated Metal
1 Competition Way
Springfield, OH 45504

Dear Mary Jacobs:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact RAPCA.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: RAPCA



Ohio EPA
State of Ohio Environmental Protection Agency

TITLE V PERMIT

Issue Date: 02/12/98

FINAL ISSUANCE

Effective Date: 02/12/98

Expiration Date: 02/12/03

This document constitutes issuance to:

Fabricated Metal
1 Competition Way
Springfield, OH 45504

of a Title V permit for Facility ID: 08-12-71-9999

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

K001 (E-coat dip system)

Coating of electrical control panels and components

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

RAPCA
451 West Third Street
PO Box 972
Dayton, OH 45422
(937) 225-4435

OHIO ENVIRONMENTAL PROTECTION AGENCY

Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

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 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 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 promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. 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. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 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. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. 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 submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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.

8. Marketable Permit Programs

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

9. Reasonably Anticipated Operating Scenarios

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

10. Reopening for Cause

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

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. 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.

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - 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 paragraph (E) of OAC rule 3745-77-03.

- 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.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

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

15. Emergencies

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

16. Off Permit Changes

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

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

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

18. Insignificant Activity

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

B. State Only Enforceable Section

1. Permit to Install Requirement

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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. Records Retention Requirements

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.

4. Inspections and Information Requests

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. 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.

7. 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.

8. 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.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:
B001: 2- 2 MMBTU/HR Building Air Supply Units
B002: 6 MMBTU/HR Natural Gas Fired Boiler #1
K002: Powder Coating Operation w/ Oven
Z001: Welding Operation
Z002: Gasketing Operation
Z003: 2 MMBTU/HR Natural Gas Fired Building Heater

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitation and/or control requirements contained within a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: E-coat dip system (K001)
Activity Description: Coating of electrical control panels and components

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Electrocoating dip tank with bake oven; misc. metal parts coating line.	OAC rule 3745-21-09 (U)(1)(c) See section A.VI.	3.5 pounds of volatile organic compounds (VOC) per gallon of coating, as a daily volume-weighted average, excluding water and exempt solvents.
	OAC rule 3745-17-10(B)	0.020 pound of particulates per mmBtu of actual heat input.
	OAC rule 3745-17-07(A)	Visible particulate emissions from the oven stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a The VOC content of the coating employed in the electrocoating dip tank of this emissions unit shall comply with the VOC content limitation of 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents. To ensure compliance with this VOC content limitation, the combination of materials added to the dip tank (i.e., pigment, resin, glycol ether and hexyl cellosolve) on a daily basis also shall meet 3.5 pounds of VOC per gallon of coating materials as a volume-weighted average, excluding water and exempt solvents.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the electrocoating dip tank:
 - a. The name and identification number of each material added to the dip tank.
 - b. The VOC content, excluding water and exempt solvents, in pounds per gallon, of each material added to the dip tank.
 - c. The number of gallons of each material added to the dip tank, excluding water and exempt solvents.
 - d. The daily, volume-weighted average VOC content of the combination of materials (i.e., pigment, resin, glycol ether and hexyl cellosolve) added to the dip tank, excluding water and exempt solvents, i.e., the sum of (b) x (c) for all individual materials divided by the total number of gallons of all materials.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coating materials. 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 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation-
3.5 lbs/gallon VOC, excluding water and exempt solvents

Applicable Compliance Method

If required, USEPA Method 24 shall be used to determine the VOC content of the coating in the electrocoating dip tank. If, pursuant to Section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. On a day-to-day basis, compliance with this VOC content limitation shall be demonstrated by ensuring that the VOC content of the combination of all coating materials added to the dip tank meets 3.5 pounds VOC/ gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.

- 1.b Emission Limitation-
3.5 lbs of VOC/gallon of coating materials, as a daily volume-weighted average of all the materials added to the dip tank, excluding water and exempt solvents

Applicable Compliance Method-

Compliance shall be based upon the record keeping specified in Section A.III and by calculating the volume-weighted average of all the materials added to the dip tank on a daily basis using the following equation:

$$\frac{[(\# \text{ gal of pigment})(\text{VOC content}) + (\# \text{ gal of resin})(\text{VOC content}) + (\# \text{ gal of glycol ether})(\text{VOC content}) + (\# \text{ gal of hexyl cellosolve})(\text{VOC content})]}{\text{total } \# \text{ of gallons of all materials for that day}} = \text{daily volume-weighted average}$$

- 1.c Emission Limitation-
20% opacity, as a six minute average, except as provided by rule

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

- 1.d Emission Limitation-
0.020 pound of particulates per mmBtu of actual heat input

Applicable Compliance Method-

If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(9).

VI. Miscellaneous Requirements

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install modification #08-3486, as issued on January 16, 1996: A.I.1. and B.I.1.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Electrocoating dip tank with bake oven; misc. metal parts coating line.	OAC rule 3745-31-05 See section A.VI.	2.63 lbs of VOC per gallon of coating, as a monthly volume-weighted average, excluding water and exempt solvents 7023 lbs VOC/month and 42.14 TPY VOC 1.0 TPY particulate matter (PM) 1.10 TPY nitrogen oxides (NOx)

2. Additional Terms and Conditions

- 2.a The VOC content of the coating employed in the electrocoating dip tank of this emissions unit shall comply with the VOC content limitation of 2.63 lbs VOC/gallon of coating, excluding water and exempt solvents, as a monthly volume-weighted average. To ensure compliance with this VOC content limitation, the combination of materials added to the dip tank (i.e., pigment, resin, glycol ether and hexyl cellosolve) on a monthly basis also shall meet 2.63 pounds of VOC per gallon of coating materials as a volume-weighted average, excluding water and exempt solvents.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the electrocoating dip tank:
 - a. The name and identification number of each material added to the dip tank.
 - b. The VOC content, excluding water and exempt solvents, in pounds per gallon, for each material added to the dip tank.
 - c. The number of gallons of each material added to the dip tank, excluding water and exempt solvents.
 - d. The monthly volume-weighted average VOC content, excluding water and exempt solvents, in pounds per gallon, for the combined materials.
 - e. The total VOC usage of all the materials added to the dip tank, in pounds, i.e., the sum of (b) x (c) for all individual materials.
 - f. The number of gallons of coating waste material sent to drain.
 - g. The VOC content, excluding water and exempt solvents, in pounds per gallon, for the coating waste material sent to drain.
 - h. The total VOCs in the coating waste material sent to drain, in pounds, i.e., (f) x (g).
 - i. The total VOC emissions from all of the coating materials employed, in pounds, i.e., (e) - (h).
2. The permittee shall maintain annual records of the amount of natural gas consumed in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Director, in accordance with paragraph B.2.b. of the General Terms and Conditions, which identify each month during which the monthly VOC emission rate exceeded 7023 lbs VOC/month, and the actual VOC emission rate for the month.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coating materials. 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 30 days following the end of the calendar month.
3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation-
7023 lbs/month VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in Section B.III.1. of this permit.
 - 1.b Emission Limitation-
42.14 TPY VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in Section B.III.1. and shall be the sum of the 12 monthly VOC emission rates for the calendar year.

V. Testing Requirements (continued)

- 1.c** Emission Limitation-
1.00 TPY PM and
1.10 TPY NOX

Applicable Compliance Method-

Compliance shall be determined by multiplying the actual annual natural gas usage times the appropriate AP-42 emission factor (for PM, 4.5 lbs/million cubic feet; for NOX, 100 lbs/million cubic feet) and dividing by 2000 lbs/ton.

- 1.d** Emission Limitation-
2.63 lbs of VOC/gallon of coating, excluding water and exempt solvents, as a monthly volume-weighted average

Applicable Compliance Method-

On a month-to-month basis, compliance with this VOC content limitation shall be demonstrated by ensuring that the VOC content of the combination of all coating materials added to the dip tank meets 2.63 pounds VOC/ gallon of coating, excluding water and exempt solvents, as a monthly volume-weighted average.

- 1.e** Emission Limitation-
2.63 lbs of VOC/gallon of coating as a monthly volume-weighted average of all the materials added to the dip tank, excluding water and exempt solvents

Applicable Compliance Method-

Compliance shall be based upon the recordkeeping in specified in Section B.III.1 and by calculating the volume-weighted average of all the materials added to the dip tank on a monthly basis using the following equation:

$$\frac{[(\# \text{ gal of pigment})(\text{VOC content}) + (\# \text{ gal of resin})(\text{VOC content}) + (\# \text{ gal of glycol ether})(\text{VOC content}) + (\# \text{ gal of hexyl cellosolve})(\text{VOC content})]}{\text{total \# of gallons of all materials for that month}} = \text{monthly volume-weighted average}$$

VI. Miscellaneous Requirements

1. The permittee is hereby notified that this permit and all agency records concerning the permitted emissions units are subject to public disclosure in accordance with OAC 3745-49-03.

Facility Name: **Fabricated Metal**
Facility ID: **08-12-71-9999**

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