



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

06/28/07

CERTIFIED MAIL

**RE: Preliminary Proposed Title V
Chapter 3745-77 permit**

03-87-00-0046
MSC Walbridge Coatings Inc
Roger J Blem
30610 East Broadway
Walbridge, OH 43465

Dear Roger J Blem:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 04/24/07. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **In order to facilitate our review of all the comments or concerns you may have with the enclosed preliminary proposed permit, please provide a hand marked-up copy of the permit showing the changes you think are necessary, along with any additional summary comments, within fourteen (14) days from your receipt of this letter to:**

**Andrew Hall
Permit Review/Development Section
Ohio EPA, Division of Air Pollution Control
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43215**

and

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

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Sincerely,


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

cc: Northwest District Office
File, DAPC PIER



State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Issue Date: 06/28/07

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 03-87-00-0046 to:

MSC Walbridge Coatings Inc
30610 East Broadway
Walbridge, OH 43465

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B001 (boiler #1) 25.1 MBTU natural or landfill gas fired, industrial steam boiler for process steam generation	25.1 MBTU natural or landfill gas fired, industrial steam boiler for process steam generation	roll coating application with 65 MBTU / hour, natural gas fired paint curing oven with thermal oxidizer incinerator
B002 (boiler #2) 7.32 MBTU natural or landfill gas fired, industrial steam boiler for process steam generation	K001 (prime paint curing oven) roll coating application with 65 MBTU / hour, natural gas fired paint curing oven with thermal oxidizer incinerator	P001 (wet scrubber - EG) exhaust collection from electrogalvanizing
B003 (boiler #3)	K002 (finish paint curing oven)	

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

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

Ohio Environmental Protection Agency

Chris Korleski
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

- i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c)).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those

reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by

permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))
- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

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.

(Authority for term: OAC rule 3745-77-07(A)(5))

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

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, in accordance with A.10 below. 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.
- f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
 - i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

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.

(Authority for term: OAC rule 3745-77-07(A)(8))

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.

(Authority for term: OAC rule 3745-77-07(A)(9))

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.

(Authority for term: OAC rule 3745-77-07(A)(10))

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 (18) 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.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

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.

(Authority for term: OAC rule 3745-77-07(B))

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 Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA 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 (i.e., postmarked) 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.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

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.

(Authority for term: OAC rule 3745-77-07(F))

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).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

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.

(Authority for term: OAC rule 3745-77-07(G))

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 of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions 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.
- 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.

(Authority for term: OAC rule 3745-77-07(I))

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.

(This term is provided for informational purposes only.)

18. Insignificant Activities or Emissions Levels

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

(Authority for term: OAC rule 3745-77-07(A)(1))

19. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent “modification” or “installation” as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an “emissions unit” as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

(Authority for term: OAC rule 3745-77-01)

22. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. 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.

3. 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.

4. 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).

5. 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.

6. 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 emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. This facility is subject to 40 CFR Part 63, Subparts SSSS, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart SSSS. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart SSSS. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart SSSS, and Subpart A. All the requirements of 40 CFR Part 63, Subpart A are specified in Attachment A. All the requirements of 40 CFR Part 63, Subpart Subpart SSSS are specified in Attachment B.

(Authority for term: 40 CFR Part 63, Subpart SSSS)

2. This facility is subject to 40 CFR Part 63, Subparts DDDDD, National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart DDDDD. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 10 of 40 CFR Part 63, Subpart DDDDD. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart DDDDD, and Subpart A. All the requirements of 40 CFR Part 63, Subpart DDDDD are specified in Attachment C.

(Authority for term: 40 CFR Part 63, Subpart DDDDD)

3. The following insignificant emissions units are located at this facility:

hydraulic oil storage, emissions unit T002;
ship oil storage, emissions unit T003; and
prelube oil storage, emissions unit T004.

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

B. State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

caustic storage, emissions unit T005;
sulfuric acid storage, emissions unit T006;
polymer storage, emissions unit T007;
cleaner storage, emissions unit T008;
electrolyte storage #1, emissions unit T009;
electrolyte storage #2, emissions unit T010;
electrolyte storage #3, emissions unit T011;
electrolyte storage #4, emissions unit T012;
electrolyte storage #5, emissions unit T013;
electrolyte storage #6, emissions unit T014;
electrolyte storage #7, emissions unit T015;
pump cleaning tank, emissions unit T016;
laminator heater, emissions unit P002;
alkaline waste tank #1, emissions unit T017;
alkaline waste tank #2, emissions unit T018;
acid waste tank #2, emissions unit T019;
metals waste tank #T1, emissions unit T020; and
metals waste #T8, emissions unit T021.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: boiler #1 (B001)

Activity Description: 25.1 MBTU natural or landfill gas fired, industrial steam boiler for process steam generation

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>
natural gas/landfill gas-fired boiler (rated maximum capacity of 25.1 MMBtu/hr)	OAC rule 3745-31-05(A)(3) (PTI #03-16179, issued on 2/10/05, modified on 2/27/07)	2.44 lbs nitrogen oxides (NOx)/hr; 10.69 tons NOx/yr
		2.05 lbs carbon monoxide (CO)/hr; 8.98 tons CO/yr
		0.13 lb organic compounds (OC)/hr; 0.57 ton OC/yr
		2.39 lbs sulfur dioxide (SO ₂)/hr; 10.47 tons SO ₂ /yr
		0.41 lb particulate emissions (PE)/hr; 1.80 tons PE/yr
		Visible PE shall not exceed 10% opacity, as a six-minute average.
		See A.I.2.a.
	OAC rule 3745-17-10(B)(1)	See A.I.2.b.
	OAC rule 3745-17-07(A)(1)	See .A.I.2.c.
	OAC rule 3745-21-08(B)	See A.I.2.e.
	40 CFR, Part 63, Subpart DDDDD	See A.I.2.f.

2. Additional Terms and Conditions

- 2.a Best Available Technology (BAT) must be employed. For this emissions unit BAT has been determined to be compliance with the terms and conditions of this permit.
- 2.b The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The visible emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions (continued)

- 2.d** OAC Chapter 3745-18 does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas/treated landfill gas* as fuel.

* "Treated" landfill gas is considered to be equivalent to natural gas.

- 2.e** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install 03-16179.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.f** This emissions unit is subject to 40 CFR, Part 63, Subpart DDDDD. However, pursuant to 40 CFR, Part 63.7506(b), this emissions unit is subject to only the initial notification requirements in 40 CFR, Part 63.9(b) (i.e., it is not subject to the emissions limits, work practice standards, performance testing, monitoring, SSMP, site-specific monitoring plans, recordkeeping and reporting requirements of this subpart or any other requirements in subpart A of this part).

II. Operational Restrictions

1. The emissions unit shall burn "treated" landfill gas and/or natural gas only.

[OAC rule 3745-77-07(A)(1) and PTI #03-16179]

III. Monitoring and/or Record Keeping Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or "treated" landfill gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

V. Testing Requirements

1. Compliance with the emissions limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

- 1.a** Emissions Limitations:
2.44 lbs NO_x/hr, 10.69 tons NO_x/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable NO_x emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (24,416 ft³/hr) by the emission factor of 100 lbs NO_x/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable NO_x emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 7.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

- 1.b** Emissions Limitations:
2.05 lbs CO/hr; 8.98 tons CO/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable CO emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (24,416 ft³/hr) by the emission factor of 84 lbs CO/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 10.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

- 1.c** Emissions Limitations:
0.13 lb OC/hr; 0.57 ton OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (24,416 ft³/hr) by the emission factor of 5.5 lbs OC/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-2 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 18, 25, or 25A, as appropriate.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

The annual emissions limitation was developed by multiplying the lbs OC/hr limitation, the maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, if compliance is shown with the lb OC/hr limitation, compliance with the annual limitation will be assumed.

V. Testing Requirements (continued)

- 1.d** Emissions Limitations:
2.39 lbs SO₂/hr; 10.47 tons SO₂/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable SO₂ emission limitation by using the following equation:

$SO_2 = (\text{ppmv}) \times (\text{MW}) \times (\text{DSCFM}) \times (1.5584 \times 10E-07)$ at 680 deg F and 29.92 inches Hg (equation to convert ppm to lbs/hr)

where,

ppmv = the concentration of SO₂ in landfill gas [given as 46.9 ppmv in AP-42 Chapter 2 Section 4 (11/98)]

MW = molecular weight of SO₂ (64.04 lbs/lb moles)

DSCFM = stack gas dry volumetric flow rate at standard conditions (5100 ft³/minute)

If required, the permittee shall demonstrate compliance with the hourly allowable SO₂ emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 6.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

- 1.e** Emissions Limitation:
0.41 lb PE/hr; 1.80 tons PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable PE limitation by multiplying the maximum landfill gas fuel usage of 50,228 ft³/hr by the emission factor of 8.2 lb PE/mm cu. ft of natural gas [from AP-42, Chapter 2, Table 2.4-5 (revised 11/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods, 1-5.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

- 1.f** Emissions Limitation:
Visible PE shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002.

VI. Miscellaneous Requirements

None

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>
natural gas/landfill gas fired boiler (rated maximum capacity of 25.1 MMBtu/hr)	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: boiler #2 (B002)

Activity Description: 7.32 MBTU natural or landfill gas fired, industrial steam boiler for process steam generation

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>
natural gas/landfill gas fired boiler (rated maximum capacity of 7.321 MMBtu/hr)	OAC rule 3745-31-05(A)(3) (PTI #03-16179, issued on 2/10/05, modified on 2/27/07)	0.71 lb nitrogen oxides (NOx)/hr; 3.11 tons NOx/yr
		0.60 lb carbon monoxide (CO)/hr; 2.63 tons CO/yr
		0.04 lb organic compounds (OC)/hr; 0.18 ton OC/yr
		0.75 lb sulfur dioxide (SO2)/hr; 3.29 tons SO2/yr
		0.12 lb particulate emissions (PE)/hr; 0.53 ton PE/yr
		Visible PE shall not exceed 10% opacity, as a six-minute average.
	OAC rule 3745-17-10(B)(1)	See A.I.2.a.
	OAC rule 3745-17-07(A)(1)	See A.I.2.b.
	OAC rule 3745-21-08(B)	See .A.I.2.c.
	40 CFR, Part 63, Subpart DDDDD	See A.I.2.e.
		See A.I.2.f.

2. Additional Terms and Conditions

- 2.a Best Available Technology (BAT) must be employed. For this emissions unit BAT has been determined to be compliance with the terms and conditions of this permit.
- 2.b The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The visible emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions (continued)

- 2.d** OAC Chapter 3745-18 does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas/treated landfill gas* as fuel.

* "Treated" landfill gas is considered to be equivalent to natural gas.

- 2.e** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install 03-16179.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.f** This emissions unit is subject to 40 CFR, Part 63, Subpart DDDDD. However, pursuant to 40 CFR, Part 63.7506(b), this emissions unit is subject to only the initial notification requirements in 40 CFR, Part 63.9(b) (i.e., it is not subject to the emissions limits, work practice standards, performance testing, monitoring, SSMP, site-specific monitoring plans, recordkeeping and reporting requirements of this subpart or any other requirements in subpart A of this part).

II. Operational Restrictions

1. The emissions unit shall burn "treated" landfill gas and/or natural gas only.

[OAC rule 3745-77-07(A)(1) and PTI #03-16179]

III. Monitoring and/or Record Keeping Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or "treated" landfill gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

V. Testing Requirements

1. Compliance with the emissions limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

- 1.a** Emissions Limitations:
0.71lb NOx/hr, 3.11 tons NOx/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable NOx emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (7,120 ft³/hr) by the emission factor of 100 lbs NOx/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 7.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

- 1.b** Emissions Limitations:
0.60 lb CO/hr; 2.63 tons CO/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable CO emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (7,120 ft³/hr) by the emission factor of 84 lbs CO/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 10.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

- 1.c** Emissions Limitations:
0.04 lb OC/hr; 0.18 ton OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (7,120 ft³/hr) by the emission factor of 5.5 lbs OC/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 18, 25, or 25A, as appropriate.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

The annual emissions limitation was developed by multiplying the lbs OC/hr limitation, the maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, if compliance is shown with the lb OC/hr limitation, compliance with the annual limitation will be assumed.

V. Testing Requirements (continued)

- 1.d** Emissions Limitations:
0.75 lb SO₂/hr; 3.29 tons SO₂/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable SO₂ emission limitation by using the following equation:

$SO_2 = (\text{ppmv}) \times (\text{MW}) \times (\text{DSCFM}) \times (1.5584 \times 10E-07)$ at 680 deg F and 29.92 inches Hg (equation to convert ppm to lbs/hr)

where,

ppmv = the concentration of SO₂ in landfill gas [given as 46.9 ppmv in AP-42 Chapter 2 Section 4 (11/98)]

MW = molecular weight of SO₂ (64.04 lbs/lb moles)

DSCFM = stack gas dry volumetric flow rate at standard conditions (1600 ft³/minute)

If required, the permittee shall demonstrate compliance with the hourly allowable SO₂ emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 6.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

- 1.e** Emissions Limitation:
0.12 lb PE/hr; 0.53 ton PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable PE limitation by multiplying the maximum landfill gas fuel usage of 14,612 ft³/hr by the emission factor of 8.2 lbs PE/mm cu. ft of natural gas [from AP-42, Chapter 2, Table 2.4-5 (revised 11/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods, 1-5.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

- 1.f** Emissions Limitation:
Visible PE shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002.

VI. Miscellaneous Requirements

None

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>
natural gas/landfill gas fired boiler (rated maximum capacity of 7.321 MMBtu/hr)	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: boiler #3 (B003)

Activity Description: 25.1 MBTU natural or landfill gas fired, industrial steam boiler for process steam generation

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>
natural gas/landfill gas-fired boiler (rated maximum capacity of 25.1 MMBtu/hr)	OAC rule 3745-31-05(A)(3) (PTI #03-16179, issued on 2/10/05, modified on 2/27/07)	2.44 lbs nitrogen oxides (NOx)/hr; 10.69 tons NOx/yr
		2.05 lbs carbon monoxide (CO)/hr; 8.98 tons CO/yr
		0.13 lb organic compounds (OC)/hr; 0.57 ton OC/yr
		2.39 lbs sulfur dioxide (SO ₂)/hr; 10.47 tons SO ₂ /yr
		0.41 lb particulate emissions (PE)/hr; 1.80 tons PE/yr
		Visible PE shall not exceed 10% opacity, as a six-minute average.
		See A.I.2.a.
	OAC rule 3745-17-10(B)(1)	See A.I.2.b.
	OAC rule 3745-17-07(A)(1)	See .A.I.2.c.
	OAC rule 3745-21-08(B)	See A.I.2.e.
	40 CFR, Part 63, Subpart DDDDD	See A.I.2.f.

2. Additional Terms and Conditions

- 2.a Best Available Technology (BAT) must be employed. For this emissions unit BAT has been determined to be compliance with the terms and conditions of this permit.
- 2.b The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The visible emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions (continued)

- 2.d** OAC Chapter 3745-18 does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas/treated landfill gas* as fuel.

* "Treated" landfill gas is considered to be equivalent to natural gas.

- 2.e** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install 03-16179.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.f** This emissions unit is subject to 40 CFR, Part 63, Subpart DDDDD. However, pursuant to 40 CFR, Part 63.7506(b), this emissions unit is subject to only the initial notification requirements in 40 CFR, Part 63.9(b) (i.e., it is not subject to the emissions limits, work practice standards, performance testing, monitoring, SSMP, site-specific monitoring plans, recordkeeping and reporting requirements of this subpart or any other requirements in subpart A of this part).

II. Operational Restrictions

1. The emissions unit shall burn "treated" landfill gas and/or natural gas only.

[OAC rule 3745-77-07(A)(1) and PTI #03-16179]

III. Monitoring and/or Record Keeping Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or "treated" landfill gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-16179]

V. Testing Requirements

1. Compliance with the emissions limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

- 1.a** Emissions Limitations:
2.44 lbs NO_x/hr, 10.69 tons NO_x/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable NO_x emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (24,416 ft³/hr) by the emission factor of 100 lbs NO_x/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable NO_x emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 7.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

- 1.b** Emissions Limitations:
2.05 lbs CO/hr; 8.98 tons CO/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable CO emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (24,416 ft³/hr) by the emission factor of 84 lbs CO/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-1 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 10.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

- 1.c** Emissions Limitations:
0.13 lb OC/hr; 0.57 ton OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable OC emission limitation by multiplying the maximum natural gas/landfill gas fuel usage rate (24,416 ft³/hr) by the emission factor of 5.5 lbs OC/mm cu ft. of natural gas [from AP-42, Chapter 1, Table 1.4-2 (revised 7/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 18, 25, or 25A, as appropriate.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

The annual emissions limitation was developed by multiplying the lbs OC/hr limitation, the maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, if compliance is shown with the lb OC/hr limitation, compliance with the annual limitation will be assumed.

V. Testing Requirements (continued)

- 1.d** Emissions Limitations:
2.39 lbs SO₂/hr; 10.47 tons SO₂/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable SO₂ emission limitation by using the following equation:

$SO_2 = (\text{ppmv}) \times (\text{MW}) \times (\text{DSCFM}) \times (1.5584 \times 10E-07)$ at 680 deg F and 29.92 inches Hg (equation to convert ppm to lbs/hr)

where,

ppmv = the concentration of SO₂ in landfill gas [given as 46.9 ppmv in AP-42 Chapter 2 Section 4 (11/98)]

MW = molecular weight of SO₂ (64.04 lbs/lb moles)

DSCFM = stack gas dry volumetric flow rate at standard conditions (5100 ft³/minute)

If required, the permittee shall demonstrate compliance with the hourly allowable SO₂ emission limitation above based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 6.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

- 1.e** Emissions Limitation:
0.41 lb PE/hr; 1.80 tons PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable PE limitation by multiplying the maximum landfill gas fuel usage of 50,228 ft³/hr by the emission factor of 8.2 lb PE/mm cu. ft of natural gas [from AP-42, Chapter 2, Table 2.4-5 (revised 11/98)].

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods, 1-5.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, as long as compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall be assumed.

- 1.f** Emissions Limitation:
Visible PE shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002.

VI. Miscellaneous Requirements

None

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>
natural gas/landfill gas fired boiler (rated maximum capacity of 25.1 MMBtu/hr)	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: prime paint curing oven (K001)

Activity Description: roll coating application with 65 MBTU / hour, natural gas fired paint curing oven with thermal oxidizer incinerator

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
coil coating operation with prime paint curing oven, two coating stations, and thermal incinerator integrated into oven	OAC 3745-31-05(A)(3) (PTI #03-746, issued on 05/04/1979)	37 lbs volatile organic compounds (VOC/hr), 125 tons VOC/yr, for emissions units K001 and K002, combined
		See A.I.2.a.
	OAC rule 3745-21-09(B)(6)	See A.I.2.b.
	40 CFR Part 63, Subpart SSSS	See A.I.2.c.

2. Additional Terms and Conditions

- Best Available Technology (BAT) must be employed. For this emissions unit BAT has been determined to be use of a thermal incinerator, and compliance with the terms and conditions of this permit.
- In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (E) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to 40 CFR Part 63, Subpart SSSS. Also, the monitoring, record keeping and reporting requirements established under OAC rule 3745-21-09(B)(6) are less stringent than those established pursuant to 40 CFR Part 63, Subpart SSSS, except for the frequency of reporting. Therefore, the frequency of reporting shall continue to be quarterly, as established under OAC 3745-21-09(B)(6).
- The permittee shall comply with all applicable requirements in 40 CFR, Part 63, Subpart SSSS. The requirements of this applicable rule are found in Appendix B, to this permit, and are referenced in the Facility Terms and Conditions (A.1).

II. Operational Restrictions

- The use of cleanup material shall not exceed 14,600 gallons/year.
 [OAC rule 3745-77-07(A)(1) and PTI #03-746]
- This emissions unit shall burn natural gas and/or oven emissions only.
 [OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for all the coatings employed in emissions units K00:
 - 1.a the name, identification number, and densities of each coating employed;
 - 1.b the VOC content of each coating employed, as applied, in pounds per gallon;
 - 1.c the number of gallons of each coating employed;
 - 1.d the VOC emissions rate for each coating employed [III.1.b x III.1.c x (1 - the control efficiency demonstrated in the most recent compliance test)], in pounds;
 - 1.e the total VOC emissions rate for all the coatings employed (summation of III.1.d for all coatings), in lbs or tons; and
 - 1.f the annual, year-to-date number of gallons of coating material used (summation of III.1.c for each calendar month to date from January to December).

[OAC rule 3745-77-07(C)(1)]

2. The permittee shall collect and record the annual year to date VOC emissions for all the coatings employed, for emissions units K001 and K002, combined (summation of III.1.e for K001 and K002, for each calendar month to date from January to December), in tons.

[OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information each month for cleanup operations, for emissions units K001 and K002, combined:
 - 3.a the name and identification of each cleanup material employed;
 - 3.b the VOC content of each cleanup material employed, in pounds per gallon;
 - 3.c the number of gallons of each cleanup material employed;
 - 3.d the VOC emissions from each cleanup material employed (III.3.b x III.3.c);
 - 3.e the total VOC emissions from all cleanup materials employed (the summation of III.3.d for all cleanup materials), in pounds or tons;
 - 3.f the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of III.3.e for each calendar month to date from January to December); and
 - 3.g the annual, year to date number of gallons of cleanup material used (summation of III.3.c for each calendar month to date from January to December).

[OAC rule 3745-77-07(C)(1)]

4. The permittee shall collect and record the annual year to date VOC emissions from the coating and cleanup operations, in tons per year (summation of III.2 and III.3.f), for emissions units K001 and K002, combined.

[OAC rule 3745-77-07(C)(1)]

5. The permittee shall maintain annual records of the operating schedule of the emissions unit (hours/year).

[OAC rule 3745-77-07(C)(1)]

6. The permittee shall maintain annual records of the quantity of natural gas used per year to operate this emission unit including the afterburner (cubic feet per year).

[OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

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

[OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit an annual summary report that identifies the following:
 - 1.a the actual annual VOC emissions from the coating operations for emissions units K001 and K002, combined;
 - 1.b the actual annual VOC emissions from the cleanup operations for emissions units K001 and K002, combined;
 - 1.c the total actual annual VOC emissions from the coating and cleanup operations for emissions units K001 and K002, combined;
 - 1.d the total number of gallons of each coating and cleanup material used, and the solvent density of each material;
 - 1.e the total actual annual number of gallons of cleanup materials used;
 - 1.f the total quantity of natural gas used to operate this emission unit including the afterburner; and
 - 1.g the total number of hours of operation for this emissions unit.

This annual report shall be submitted by January 31 of each year, and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-746]

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or oven emissions were burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
 - 1.a The emissions testing shall be conducted 2.5 years after the effective date of the permit. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - 1.b The emissions testing shall be conducted to demonstrate compliance with the allowable mass emissions rates for VOC, and shall include the capture and control efficiencies of the control equipment.

V. Testing Requirements (continued)

1.c The following test methods shall be employed to demonstrate compliance with the above emissions limitations:

i. for VOC, Methods 1-4 and 18, 25, or 25C of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

1.d The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

1.e Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA's refusal to accept the results of the emissions tests.

1.f Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

1.g A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA NWDO.

2. Compliance with the emissions limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

2.a Emissions Limitations:
37 lbs VOC/hr, 125 tons VOC/yr, for emissions units K001 and K002, combined

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with the performance testing required in condition V.1 of this permit.

Compliance with the annual emission limitation shall be demonstrated based on the record keeping requirements established in section III.1 and III.2 of this permit.

VI. Miscellaneous Requirements

None

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>
coil coating operation with prime paint curing oven, two coating stations, and thermal incinerator integrated into oven	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: finish paint curing oven (K002)

Activity Description: roll coating application with 65 MBTU / hour, natural gas fired paint curing oven with thermal oxidizer incinerator

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
coil coating operation with finish paint curing oven, two coating stations, and thermal incinerator integrated into oven	OAC 3745-31-05(A)(3) (PTI #03-746, issued on 05/04/1979)	37 lbs volatile organic compounds (VOC/hr), 125 tons VOC/yr, for emissions units K001 and K002, combined
		See A.I.2.a.
	OAC rule 3745-21-09(B)(6)	See A.I.2.b.
	40 CFR Part 63, Subpart SSSS	See A.I.2.c.

2. Additional Terms and Conditions

- Best Available Technology (BAT) must be employed. For this emissions unit BAT has been determined to be use of a thermal incinerator, and compliance with the terms and conditions of this permit.
- In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (E) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to 40 CFR Part 63, Subpart SSSS. Also, the monitoring, record keeping and reporting requirements established under OAC rule 3745-21-09(B)(6) are less stringent than those established pursuant to 40 CFR Part 63, Subpart SSSS, except for the frequency of reporting. Therefore, the frequency of reporting shall continue to be quarterly, as established under OAC 3745-21-09(B)(6).
- The permittee shall comply with all applicable requirements in 40 CFR, Part 63, Subpart SSSS. The requirements of this applicable rule are found in Appendix B, to this permit, and are referenced in the Facility Terms and Conditions (A.1).

II. Operational Restrictions

- The use of cleanup material shall not exceed 14,600 gallons/year.
 [OAC rule 3745-77-07(A)(1) and PTI #03-746]
- This emissions unit shall burn natural gas and/or oven emissions only.
 [OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for all the coatings employed in emissions units K00:
 - 1.a the name, identification number, and densities of each coating employed;
 - 1.b the VOC content of each coating employed, as applied, in pounds per gallon;
 - 1.c the number of gallons of each coating employed;
 - 1.d the VOC emissions rate for each coating employed [III.1.b x III.1.c x (1 - the control efficiency demonstrated in the most recent compliance test)], in pounds;
 - 1.e the total VOC emissions rate for all the coatings employed (summation of III.1.d for all coatings), in lbs or tons; and
 - 1.f the annual, year-to-date number of gallons of coating material used (summation of III.1.c for each calendar month to date from January to December).

[OAC rule 3745-77-07(C)(1)]

2. The permittee shall collect and record the annual year to date VOC emissions for all the coatings employed, for emissions units K001 and K002, combined (summation of III.1.e for K001 and K002, for each calendar month to date from January to December), in tons.

[OAC rule 3745-77-07(C)(1)]

3. The permittee shall collect and record the following information each month for cleanup operations, for emissions units K001 and K002, combined:
 - 3.a the name and identification of each cleanup material employed;
 - 3.b the VOC content of each cleanup material employed, in pounds per gallon;
 - 3.c the number of gallons of each cleanup material employed;
 - 3.d the VOC emissions from each cleanup material employed (III.3.b x III.3.c);
 - 3.e the total VOC emissions from all cleanup materials employed (the summation of III.3.d for all cleanup materials), in pounds or tons;
 - 3.f the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of III.3.e for each calendar month to date from January to December); and
 - 3.g the annual, year to date number of gallons of cleanup material used (summation of III.3.c for each calendar month to date from January to December).

[OAC rule 3745-77-07(C)(1)]

4. The permittee shall collect and record the annual year to date VOC emissions from the coating and cleanup operations, in tons per year (summation of III.2 and III.3.f), for emissions units K001 and K002, combined.

[OAC rule 3745-77-07(C)(1)]

5. The permittee shall maintain annual records of the operating schedule of the emissions unit (hours/year).

[OAC rule 3745-77-07(C)(1)]

6. The permittee shall maintain annual records of the quantity of natural gas used per year to operate this emission unit including the afterburner (cubic feet per year).

[OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

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

[OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit an annual summary report that identifies the following:
 - 1.a the actual annual VOC emissions from the coating operations for emissions units K001 and K002, combined;
 - 1.b the actual annual VOC emissions from the cleanup operations for emissions units K001 and K002, combined;
 - 1.c the total actual annual VOC emissions from the coating and cleanup operations for emissions units K001 and K002, combined;
 - 1.d the total number of gallons of each coating and cleanup material used, and the solvent density of each material;
 - 1.e the total actual annual number of gallons of cleanup materials used;
 - 1.f the total quantity of natural gas used to operate this emission unit including the afterburner; and
 - 1.g the total number of hours of operation for this emissions unit.

This annual report shall be submitted by January 31 of each year, and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-746]

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or oven emissions were burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
 - 1.a The emissions testing shall be conducted 2.5 years after the effective date of the permit. The testing time frame(s) specified may be amended or waived for cause upon prior request of, and written approval of, the Ohio EPA Northwest District Office.
 - 1.b The emissions testing shall be conducted to demonstrate compliance with the allowable mass emissions rates for VOC, and shall include the capture and control efficiencies of the control equipment.

V. Testing Requirements (continued)

1.c The following test methods shall be employed to demonstrate compliance with the above emissions limitations:

i. for VOC, Methods 1-4 and 18, 25, or 25C of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

1.d The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

1.e Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA's refusal to accept the results of the emissions tests.

1.f Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

1.g A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA NWDO.

2. Compliance with the emissions limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

2.a Emissions Limitations:
37 lbs VOC/hr, 125 tons VOC/yr, for emissions units K001 and K002, combined

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with the performance testing required in condition V.1 of this permit.

Compliance with the annual emission limitation shall be demonstrated based on the record keeping requirements established in section III.1 and III.2 of this permit.

VI. Miscellaneous Requirements

None

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>
coil coating operation with finish paint curing oven, two coating stations, and thermal incinerator integrated into oven	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: wet scrubber - EG (P001)
Activity Description: exhaust collection from electrogalvanizing

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>
zinc, zinc/nickel electrogalvanizing line with mist eliminator and impingement scrubber	OAC rule 3745-31-05(A)(3) (PTI #03-6307 issued on 04/29/1992)	1.49 lbs particulate emissions (PE)/hr, 6.53 tons PE/yr 0.097 lb zinc (Zn)/hr, 0.42 ton Zn/yr 0.046 lbs nickel (Ni)/hr, 0.20 tons Ni/yr
	OAC rule 3745-17-11(B)	See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b. Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a** Best Available Technology (BAT) must be employed. For this emissions unit BAT has been determined to be use of an impingement scrubber and mist eliminator, and compliance with the terms and conditions of this permit.
- 2.b** The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the static pressure drop across the scrubber, in inches of water, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the static pressure drop across the scrubber on daily basis.

III. Monitoring and/or Record Keeping Requirements (continued)

- 1.a** Whenever the monitored value for the static pressure drop across the scrubber falls below the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the static pressure drop across the scrubber immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- 1.b** The static pressure drop across the scrubber shall be continuously maintained at a value of not less than 1.5 inches of water at all times while the emissions unit is in operation.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC 3745-77-07(C)(1)]

- 2.** The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the water flow rate, in gallons per minute, across the scrubber during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the water flow rate across the scrubber on daily basis.
- 2.a** Whenever the monitored value for the water flow rate across the scrubber falls below the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the water flow rate across the scrubber immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

III. Monitoring and/or Record Keeping Requirements (continued)

- 2.b** The water flow rate across the scrubber shall be continuously maintained at a value of not less than 9.5 gallons per minute at all times while the emissions unit is in operation.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC 3745-77-07(C)(1)]

- 3.** The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the scrubber pump pressure, in pounds per square inch (psi), during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the scrubber pump pressure on daily basis.

- 3.a** Whenever the monitored value for the scrubber pump pressure falls below the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment above the acceptable level specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the scrubber pump pressure immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- 3.b** The scrubber pump pressure shall be continuously maintained at a value of not less than 30 psi at all times while the emissions unit is in operation.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the pressure drop across the scrubber was outside of the acceptable range;
 - b. each period of time when the scrubber water flow rate was outside of the acceptable range;
 - c. each period of time when the scrubber pump pressure rate was outside of the acceptable range;
 - d. an identification of each incident of deviation described in (a) and (c) above where a prompt investigation was not conducted;
 - e. an identification of each incident of deviation described in (a) and (c) where prompt corrective action, that would bring the pressure drop and/or the scrubber water flow rate into compliance with the acceptable range, was determined to be necessary and was not taken;
 - f. an identification of each incident of deviation described in (a) and (c) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

[OAC 3745-77-07(C)(1)]

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
 - 1.a The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration unless otherwise specified by Engineering Guide 16.
 - 1.b The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rates for PE, Ni, and Zn.
 - 1.c The following test methods shall be employed to demonstrate compliance with the above emissions limitations:
 - i. for PE, Methods 1- 5 of 40 CFR Part 60, Appendix A;
 - ii. for Ni, Methods 1-4 and 29 of 40 CFR Part 60, Appendix A; and
 - iii. for Zn, Methods 1-4 and 29 of 40 CFR Part 60, Appendix A.Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - 1.d The tests shall be conducted while the emissions unit is operating at its maximum capacity of 65 tons/hr, unless otherwise specified or approved by the Ohio EPA, NWDO.
 - 1.e Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA's refusal to accept the results of the emissions tests.
 - 1.f Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

V. Testing Requirements (continued)

1.g A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA NWDO.

2. Compliance with the emissions limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

2.a Emission Limitations:
0.41 lb PE/hr; 1.80 tons PE/yr

Applicable Compliance Method:

Compliance with the hourly allowable mass emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with the performance testing required in section V.1 of this permit.

The annual emissions limitation was developed by multiplying the lbs PE/hr limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the lb PE/hr limitation, compliance with the annual limitation shall be assumed.

2.b Emissions Limitations:
0.046 lb Ni/hr; 0.20 ton Ni/yr

Applicable Compliance Method:

Compliance with the hourly allowable mass emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with the performance testing required in section V.1 of this permit.

The annual emissions limitation was developed by multiplying the lbs Ni/hr limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the lb Ni/hr limitation, compliance with the annual limitation shall be assumed.

2.c Emissions Limitation:
0.097 lb Zn/hr; 0.42 ton Zn/yr

Applicable Compliance Method:

Compliance with the hourly allowable mass emission limitation shall be demonstrated based on the results of emission testing conducted in accordance with the performance testing required in section V.1 of this permit.

The annual emissions limitation was developed by multiplying the lbs Zn/hr limitation by the maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the lb Zn/hr limitation, compliance with the annual limitation shall be assumed.

2.d Emissions Limitation:
Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002.

VI. Miscellaneous Requirements

None

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>
zinc, zinc/nickel electrogalvanizing line with mist eliminator and impingement scrubber	None	Noe

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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