



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

Mailing Address:

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

06/27/01

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

04-48-01-0466
Crown Cork & Seal
Shawn Reinhart Mr.
5201 Enterprise Blvd
Toledo, OH 43612

Dear Shawn Reinhart:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Toledo Div of Environmental Services within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions or comments concerning this draft Title V permit, please contact Toledo Div of Environmental Services.

Very truly yours,

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

cc: USEPA (electronically submitted)
Michael Ahern, DAPC PMU
Toledo Div of Environmental Services
Indiana
Michigan



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 06/27/01

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: 04-48-01-0466 to:

Crown Cork & Seal
5201 Enterprise Blvd
Toledo, OH 43612

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

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Row 1: B004 (Paint line Steam Boiler) / Provides hot water for wet scction of 66 in coating line / K001 (66 inch coil coating line) Aluminum coil coating line / K004 (2nd coater - 36 inch coil coating line) An additional coater and oven was installed in the existing 36 inch coil coating line. Row 2: / / K003 (36 inch coil coating line) Steel coil coating line /

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:

Toledo Div of Environmental Services
348 South Erie Street
Toledo, OH 43602-1633
(419) 936-3015

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

8. Marketable Permit Programs

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

9. Reasonably Anticipated Operating Scenarios

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

10. Reopening for Cause

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

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

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on

information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
 - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

- (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

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

14. Operational Flexibility

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

15. Emergencies

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

16. Off Permit Changes

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

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

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

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

17. Compliance Method Requirements

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

18. Insignificant Activity

Facility Name: Crown Cork & Seal
Facility ID: 04-48-01-0466

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

B. State Only Enforceable Section

1. Permit to Install Requirement

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

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

revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

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

B001 - office boiler;
B002 - make-up air heaters;
B003 - unit heaters;
Z002 - storage tank 1;
Z003 - storage tank 2;
Z004 - storage tank 3; and
Z005 - five parts washers.

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 for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint line Steam Boiler (B004)
Activity Description: Provides hot water for wet scetion of 66 in coating line

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>
16.8 mmBtu Eclipse Lookout natural gas-fired boiler	OAC rule 3745-31-05(A)(3) (PTI 04-348)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-10(B)(1), 3745-21-07(B), 3745-21-08(B) and 3745-23-06(B). 1.5 tpy of particulate emissions 0.1 pound of nitrogen oxides (NOx) per mmBtu of actual heat input 10.3 tpy of NOx 0.02 pound of carbon monoxide (CO) per mmBtu of actual heat input 2.9 tpy of CO 0.30 grain of sulfur per 100 cubic feet of natural gas 0.00083 pound of sulfur dioxide (SO2) per mmBtu of actual heat input 0.1 tpy of SO2 0.005 pound of volatile organic compounds (VOC) per mmBtu of actual heat input
	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-10(B)(1)	0.020 pound of particulate emissions per mmBtu of actual heat input

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-18-06(A)	See A.I.2.b below.
	OAC rule 3745-21-07(B)	See A.I.2.c below.
	OAC rule 3745-21-08(B)	See A.I.2.c below.
	OAC rule 3745-23-06(B)	See A.I.2.c below.

2. Additional Terms and Conditions

- 2.a** Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08, 3745-21-07, and 3745-23-06, respectively, by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install 04-348.

II. Operational Restrictions

- 1. The permittee shall burn only natural gas as fuel in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

- 1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- 2. The permittee shall maintain annual records of the total quantity of natural gas burned in this emissions unit and the total hours of operation.

IV. Reporting Requirements

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

V. Testing Requirements

- 1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

1.b Emission Limitation:

0.020 pound of particulates per mmBtu of actual heat input

Applicable Compliance Method:

Compliance may be demonstrated based upon a particulate emission factor of 1.9 pounds of particulates per million standard cubic feet, a heating value of 1020 Btu per standard cubic foot, and the monitoring and record keeping requirements specified in section A.III. This particulate emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 3/98. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 5 of 40 CFR Part 60, Appendix A and OAC rule 3745-17-03(B)(9).

1.c Emission Limitation:

1.5 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission limitation, in lb/mmBtu, by the maximum heat input capacity of 16.8 mmBtu/hr, and by the annual hours of operation for the emissions unit, and then dividing by 2000 lbs/ton.

1.d Emission Limitation:

0.02 pound of CO per mmBtu of actual heat input

Applicable Compliance Method:

Compliance may be demonstrated based upon the monitoring and record keeping requirements specified in section A.III., an emission factor of 21 pounds of CO per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This CO emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 10/96. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 10 of 40 CFR Part 60, Appendix A.

1.e Emission Limitation:

2.9 tpy of CO

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the CO emission limitation, in lb/mmBtu, by the maximum heat input capacity of 16.8 mmBtu/hr, and by the annual hours of operation for the emissions unit, and then dividing by 2000 lbs/ton.

V. Testing Requirements (continued)

1.f Emission Limitation:

0.1 pound of NO_x per mmBtu of actual heat input

Applicable Compliance Method:

Compliance may be demonstrated based upon the monitoring and record keeping requirements specified in section A.III, an emission factor of 100 pounds of NO_x per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This NO_x emission factor is specified in Table 1.4-1 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 2/98. If required, the permittee shall demonstrate compliance with this NO_x emission limitation in accordance with the methods and procedures specified in Method 7 of 40 CFR Part 60, Appendix A.

1.g Emission Limitation:

10.3 tpy of NO_x

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the NO_x emission limitation, in lb/mmBtu, by the maximum heat input capacity of 16.8 mmBtu/hr, and by the annual hours of operation for the emissions unit, and then dividing by 2000 lbs/ton.

1.h Emission Limitation:

0.30 grain of sulfur per 100 cubic feet of natural gas

Applicable Compliance Method:

The exclusive use of natural gas as fuel will be considered an adequate demonstration of compliance.

1.i Emission Limitation:

0.00083 pound of SO₂ per mmBtu of actual heat input

Applicable Compliance Method:

Compliance may be demonstrated based upon an emission factor of 0.6 pound of SO₂ per million standard cubic feet, a heating value of 1020 Btu per standard cubic foot, and the monitoring and record keeping requirements specified in section A.III. This SO₂ emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 3/98. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-18-04(E).

1.j Emission Limitation:

0.1 tpy of SO₂

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the SO₂ emission limitation, in lb/mmBtu, by the maximum heat input capacity of 16.8 mmBtu/hr, and by the annual hours of operation for the emissions unit, and then dividing by 2000 lbs/ton.

V. Testing Requirements (continued)

1.k Emission Limitation:

0.005 pound of VOC per mmBtu of actual heat input

Applicable Compliance Method:

Compliance may be demonstrated based upon the monitoring and record keeping requirements specified in section A.III, an emission factor of 5.5 pounds of VOC per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This VOC emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 3/98. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 25 of 40 CFR Part 60, Appendix A.

1.l Emission Limitation:

0.2 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the VOC emission limitation, in lb/mmBtu, by the maximum heat input capacity of 16.8 mmBtu/hr, and by the annual hours of operation for the emissions unit, and then dividing by 2000 lbs/ton.

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>
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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: 66 inch coil coating line (K001)

Activity Description: Aluminum coil coating line

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>
66-inch coil coating line with a 16 mmBtu direct fired natural gas drying oven controlled by a permanent total enclosure and a catalytic incinerator	OAC rule 3745-31-05(A)(3) (PTI 04-1065)	2.92 lbs of volatile organic compounds (VOC) per gallon of coating solids
		50.1 lbs/hr of VOC, including emissions from cleanup materials
		See A.I.2.b, A.I.2.c and A.I.2.d below.
	OAC rule 3745-31-05(D) (PTI 04-1065)	182.1 tons of VOC per rolling, 12-month period
	OAC rule 3745-21-09(E)	See A.I.2.a.

2. Additional Terms and Conditions

- 2.a The emission limitation specified in OAC rule 3745-21-09(E) is less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The permittee shall operate and maintain a permanent total enclosure and a catalytic incinerator to capture and control the VOC emissions.
- 2.c The permittee shall maintain a minimum 90% overall control efficiency for the VOC emissions from this emissions unit.
- 2.d The permanent total enclosure shall capture 100% of the VOC emitted by the coating applicator.

II. Operational Restrictions

1. This emissions unit shall be totally enclosed such that all the OC emissions are captured for venting to the catalytic incinerator. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:
 - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all the NDO's shall be at least 3,600 m/hr (200 fpm);
 - d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water as a 3-hour average;
 - e. the direction of air flow through all NDO's shall be into the enclosure;
 - f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations in section (c) shall be closed during routine operation of the process; and
 - g. all OC emissions from the coating line must be captured and contained for discharge to the catalytic incinerator.
2. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
3. The permittee shall restrict coating usage in this emissions unit to not more than 56,814 gallons per month, and the maximum uncontrolled VOC content of the coatings shall not exceed 29.2 pounds of VOC per gallon of coating solids as a daily volume-weighted average.
4. The permittee shall restrict cleanup material usage in this emissions unit to not more than 500 gallons per month, and the maximum uncontrolled VOC content of the cleanup material shall not exceed 6.7 pounds of VOC per gallon.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record each day, all 3-hour blocks of time during which the permanent total enclosure was not maintained at an average differential pressure of at least 0.007 inch of water column whenever the emissions unit was in operation.

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

2. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The permittee shall collect and record the following information each day for this emissions unit:
- a. the name and identification number of each coating, as applied;
 - b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
 - c. the total uncontrolled VOC emissions from all coatings, in pounds per day;
 - d. the uncontrolled, daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
 - e. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the controlled VOC emission rate shall be calculated using (i) the daily volume-weighted VOC content recorded in accordance with paragraph (d) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);
 - f. the name and identification of each cleanup material employed;
 - g. the number of gallons of each cleanup material employed;
 - h. the uncontrolled VOC content of each cleanup material, in pounds per gallon;
 - i. the total uncontrolled VOC emissions from all cleanup materials, in pounds per day;
 - j. the total number of hours the emissions unit was in operation;
 - k. the average hourly uncontrolled VOC emissions from all coatings and cleanup materials, i.e., $((c)+(i))/(j)$, in pounds per hour (average); and
 - l. the average hourly controlled VOC emissions from all coatings and cleanup materials, in pounds per hour, calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

4. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the calculated, controlled VOC emissions from all coatings and cleanup materials, in tons per month;
 - b. the rolling, 12-month summation of VOC emissions from all coatings and cleanup materials, in tons;
 - c. the total volume, in gallons, as applied, of all coatings employed; and
 - d. the total volume, in gallons, of all cleanup materials employed.
5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the requirements contained in permit to install 04-1065, issued on June 25, 1997: sections A.III.2 and A.III.3.a through g. The monitoring and record keeping requirements contained in the above referenced permit to install are subsumed into the requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the permit to install.

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all 3-hour blocks of time during which the permanent total enclosure, when the emissions unit was in operation, was not maintained at an average differential pressure of at least 0.007 inch of water column.
2. The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
3. The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.
4. The permittee shall notify the Toledo Division of Environmental Services in writing of each daily record showing that the calculated, controlled VOC emission rate exceeded the applicable pounds of VOC per gallon of solids limitation for coatings. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 45 days after the exceedance occurs.
5. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the calculated, controlled VOC emission rate exceeded 50.1 lbs/hr, and the actual calculated, controlled VOC emission rate for each such day.
6. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.
7. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly coating and/or cleanup material usage limitation(s).
8. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the VOC content of the uncontrolled coatings and/or the VOC content of any uncontrolled cleanup materials exceeded 29.2 pounds of VOC per gallon of solids or 6.7 pounds of VOC per gallon, respectively.
9. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

IV. Reporting Requirements (continued)

- 10.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the requirements contained in permit to install 04-1065, issued on June 25, 1997: sections A.IV.2 through A.IV.4 and sections A.IV.6 through A.IV.8. The reporting requirements contained in the above referenced permit to install are subsumed into the requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the permit to install.

V. Testing Requirements

- 1.** Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

2.92 pounds of VOC per gallon of solids

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3, and the overall control efficiency determined during the most recent stack test which demonstrated compliance (90% based on the October 18, 1995 stack test). If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 25 of 40 CFR Part 60, Appendix A, and methods and procedures of OAC rule 3745-21-10(C).

USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

1.b Emission Limitation:

50.1 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3 and the overall control efficiency determined during the most recent stack test which demonstrated compliance (90% based on the October 18, 1995 stack test). If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 25 of 40 CFR Part 60, Appendix A and methods and procedures of OAC rule 3745-21-10(C).

1.c Emission Limitation:

100% capture efficiency for the VOC emissions

Applicable Compliance Method:

If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 204 of 40 CFR Part 60, Appendix A and the methods and procedures of OAC rule 3745-21-10(C).

V. Testing Requirements (continued)

1.d Emission Limitation:

90% overall control efficiency for the VOC emissions

Applicable Compliance Method:

If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 25 of 40 CFR Part 60, Appendix A, USEPA Methods 204 through 204F of 40 CFR Part 51, Appendix M, and methods and procedures of OAC rule 3745-21-10(C).

1.e Emission Limitation:

182.1 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.3 and A.III.4.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of the permit, approximately 2.5 years after permit issuance, and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the mass emission limitation and the capture efficiency and overall control efficiency requirements for VOC.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission limitation: for VOC, Method 25 of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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.

e. 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.)

f. 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 OAC rule 3745-21-10. 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.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

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>
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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: 36 inch coil coating line (K003)

Activity Description: Steel coil coating line

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>
36-inch coil coating line with a 30 mmBtu direct fired natural gas drying oven controlled by a permanent total enclosure and a catalytic incinerator	OAC rule 3745-31-05(A)(3) (PTI 04-1065)	1.12 pounds of volatile organic compounds (VOC) per gallon of coating solids
		16.3 lbs/hr of VOC, including emissions from cleanup materials
		See A.I.2.b, A.I.2.c and A.I.2.d below.
	OAC rule 3745-31-05(D) (PTI 04-1065)	59.5 tons of VOC per rolling, 12-month period
	OAC rule 3745-21-09(E)	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The emission limitation specified in OAC rule 3745-21-09(E) is less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The permittee shall operate and maintain a permanent total enclosure and a catalytic incinerator to capture and control the VOC emissions.
- 2.c The permittee shall maintain a minimum 90% overall control efficiency for the VOC emissions from this emissions unit.
- 2.d The permanent total enclosure shall capture 100% of the VOC emitted by the coating applicator.

II. Operational Restrictions

1. This emissions unit shall be totally enclosed such that all the OC emissions are captured for venting to the catalytic incinerator. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:
 - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all the NDO's shall be at least 3,600 m/hr (200 fpm);
 - d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water as a 3-hour average;
 - e. the direction of air flow through all NDO's shall be into the enclosure;
 - f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations in section (c) shall be closed during routine operation of the process; and
 - g. all OC emissions from the coating line must be captured and contained for discharge to the catalytic incinerator.
2. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
3. The permittee shall restrict coating usage in this emissions unit to not more than 35,370 gallons per month, and the maximum uncontrolled VOC content of the coatings shall not exceed 22.3 pounds of VOC per gallon of coating solids as a daily volume-weighted average.
4. The permittee shall restrict cleanup material usage in this emissions unit to not more than 500 gallons per month, and the maximum uncontrolled VOC content of the cleanup material shall not exceed 6.7 pounds of VOC per gallon .

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record each day, all 3-hour blocks of time during which the permanent total enclosure was not maintained at an average differential pressure of at least 0.007 inch of water column whenever the emissions unit was in operation.

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

2. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The permittee shall collect and record the following information each day for this emissions unit:
- a. the name and identification number of each coating, as applied;
 - b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
 - c. the total uncontrolled VOC emissions from all coatings, in pounds per day;
 - d. the uncontrolled, daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
 - e. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the controlled VOC emission rate shall be calculated using (i) the daily volume-weighted VOC content recorded in accordance with paragraph (d) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);
 - f. the name and identification of each cleanup material employed;
 - g. the number of gallons of each cleanup material employed;
 - h. the uncontrolled VOC content of each cleanup material, in pounds per gallon;
 - i. the total uncontrolled VOC emissions from all cleanup materials, in pounds per day;
 - j. the total number of hours the emissions unit was in operation;
 - k. the average hourly uncontrolled VOC emissions from all coatings and cleanup materials, i.e., $((c)+(i))/(j)$, in pounds per hour (average); and
 - l. the average hourly controlled VOC emissions from all coatings and cleanup materials, in pounds per hour, calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance.

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

4. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the calculated, controlled VOC emissions from all coatings and cleanup materials, in tons per month;
 - b. the rolling, 12-month summation of VOC emissions from all coatings and cleanup materials, in tons;
 - c. the total volume, in gallons, as applied, of all coatings employed; and
 - d. the total volume, in gallons, of all cleanup materials employed.
5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the requirements contained in permit to install 04-1065, issued on June 25, 1997: sections A.III.2 and A.III.3.a through g. The monitoring and record keeping requirements contained in the above referenced permit to install are subsumed into the requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the permit to install.

IV. Reporting Requirements

1. The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all 3-hour blocks of time during which the permanent total enclosure, when the emissions unit was in operation, was not maintained at an average differential pressure of at least 0.007 inch of water column.
2. The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
3. The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.
4. The permittee shall notify the Toledo Division of Environmental Services in writing of each daily record showing that the calculated, controlled VOC emission rate exceeded the applicable pounds of VOC per gallon of solids limitation for coatings. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 45 days after the exceedance occurs.
5. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the calculated, controlled VOC emission rate exceeded 16.3 lbs/hr, and the actual calculated, controlled VOC emission rate for each such day.
6. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.
7. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the monthly coating and/or cleanup material usage limitation(s).
8. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the VOC content of the uncontrolled coatings and/or the VOC content of any uncontrolled cleanup materials exceeded 29.2 pounds of VOC per gallon of solids or 6.7 pounds of VOC per gallon, respectively.
9. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

IV. Reporting Requirements (continued)

- 10.** Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the requirements contained in permit to install 04-1065, issued on June 25, 1997: sections A.IV.2 through A.IV.4 and sections A.IV.6 through A.IV.8. The reporting requirements contained in the above referenced permit to install are subsumed into the requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the permit to install.

V. Testing Requirements

- 1.** Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

1.12 pounds of VOC per gallon of solids

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3, and the overall control efficiency determined during the most recent stack test which demonstrated compliance (90% based on the October 18, 1995 stack test). If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 25 of 40 CFR Part 60, Appendix A, and methods and procedures of OAC rule 3745-21-10(C).

USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

1.b Emission Limitation:

16.3 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3 and the overall control efficiency determined during the most recent stack test which demonstrated compliance (90% based on the October 18, 1995 stack test). If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 25 of 40 CFR Part 60, Appendix A and methods and procedures of OAC rule 3745-21-10(C).

1.c Emission Limitation:

100% capture efficiency for the VOC emissions

Applicable Compliance Method:

If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 204 of 40 CFR Part 60, Appendix A and the methods and procedures of OAC rule 3745-21-10(C).

V. Testing Requirements (continued)

1.d Emission Limitation:

90% overall control efficiency for the VOC emissions

Applicable Compliance Method:

If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 25 of 40 CFR Part 60, Appendix A, USEPA Methods 204 through 204F of 40 CFR Part 51, Appendix M, and methods and procedures of OAC rule 3745-21-10(C).

1.e Emission Limitation:

59.5 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.3 and A.III.4.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months after issuance of the permit, approximately 2.5 years after permit issuance, and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the mass emission limitation and the capture efficiency and overall control efficiency requirements for VOC.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission limitation: for VOC, Method 25 of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- 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.
- e. 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.)
- f. 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 OAC rule 3745-21-10. 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.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

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>
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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

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>
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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: 2nd coater - 36 inch coil coating line (K004)

Activity Description: An additional coater and oven was installed in the existing 36 inch coil coating line

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>
36-inch coil coating line second coater with a 16 mmBtu direct-fired natural gas drying oven controlled by a permanent total enclosure and a catalytic incinerator	OAC rule 3745-31-05(A)(3) (PTI 04-1059)	39.0 lbs/hr of volatile organic compounds (VOC), including emissions from cleanup materials 170.9 tpy of VOC, including emissions from cleanup materials 0.42 lb/hr of carbon monoxide (CO) 1.8 tpy of CO 2.0 lbs/hr of nitrogen oxides (NOx) 8.8 tpy of NOx 0.09 lb/hr of particulate emissions 0.4 tpy of particulate emissions 0.01 lb/hr of sulfur dioxide (SO2) 0.05 tpy of SO2 See A.I.2.a through A.I.2.c below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07, OAC rule 3745-21-09(E), and 40 CFR Part 60, Subpart TT.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	40 CFR Part 60, Subpart TT	See A.I.2.d below.
	OAC rule 3745-17-07(A)(1)	See A.I.2.e below.
	OAC rule 3745-17-11(A)(2)	See A.I.2.f below.
	OAC rule 3745-18-06(A)	See A.I.2.f below.
	OAC rule 3745-21-08(B)	See A.I.2.h below.
	OAC rule 3745-21-09(E)	See A.I.2.g below.
	OAC rule 3745-23-06(B)	See A.I.2.h below.

2. Additional Terms and Conditions

- 2.a** The permittee shall operate and maintain a permanent total enclosure and a catalytic incinerator to capture and control the VOC emissions.
- 2.b** The permittee shall maintain a minimum 90% overall control efficiency for the VOC emissions from this emissions unit.
- 2.c** The permanent total enclosure shall capture 100% of the VOC emitted by the coating applicator.
- 2.d** The permittee shall not allow or permit the discharge into the atmosphere of more than:
 - i. 0.14 kg of volatile organic compounds (VOC) per liter of coating solids (1.17 pounds of VOC per gallon of coating solids) for each calendar month; or
 - ii. 10 percent of the VOC applied for each calendar month (90 percent emission reduction), whichever is less restrictive.
- 2.e** Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.f** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.g** The permittee shall not allow VOC emissions to exceed 4.0 pounds of VOC per gallon of solids as a daily volume-weighted average.
- 2.h** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively, by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install 04-1059.

II. Operational Restrictions

1. This emissions unit shall be totally enclosed such that all the OC emissions are captured for venting to the catalytic incinerator. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:
 - a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
 - c. the average facial velocity (FV) of air through all the NDO's shall be at least 3,600 m/hr (200 fpm);
 - d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water as a 3-hour average;
 - e. the direction of air flow through all NDO's shall be into the enclosure;
 - f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations in section (c) shall be closed during routine operation of the process; and
 - g. all OC emissions from the coating line must be captured and contained for discharge to the catalytic incinerator.
2. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
3. The permittee shall restrict the coating usage in this emissions unit to a daily average of not more than 68.2 gallons per hour, and the maximum uncontrolled VOC content of the coatings shall not exceed 23.96 pounds of VOC per gallon of coating solids as a daily volume-weighted average.
4. The permittee shall restrict cleanup material usage in this emissions unit to not more than 500 gallons per month, and the maximum uncontrolled VOC content of the cleanup material shall not exceed 6.7 pounds of VOC per gallon.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record each day, all 3-hour blocks of time during which the permanent total enclosure was not maintained at an average differential pressure of at least 0.007 inch of water column whenever the emissions unit was in operation.

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

2. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. These devices shall have an accuracy of plus or minus 2.5 degrees Celsius or plus or minus 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater, pursuant to the requirements specified in 40 CFR 60.464(c). The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
3. The permittee shall collect and record the following information each day for this emissions unit:
- a. the name and identification number of each coating, as applied;
 - b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
 - c. the total uncontrolled VOC emissions from all coatings, in pounds per day;
 - d. the uncontrolled, daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
 - e. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the controlled VOC emission rate shall be calculated using (i) the daily volume-weighted VOC content recorded in accordance with paragraph (d) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);

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

- f. the name and identification of each cleanup material employed;
 - g. the number of gallons of each cleanup material employed;
 - h. the uncontrolled VOC content of each cleanup material, in pounds per gallon;
 - i. the total uncontrolled VOC emissions from all cleanup materials, in pounds per day;
 - j. the total number of hours the emissions unit was in operation;
 - k. the average hourly uncontrolled VOC emissions from all coatings and cleanup materials, i.e., $((c)+(i))/(j)$, in pounds per hour (average);
 - l. the average hourly controlled VOC emissions from all coatings and cleanup materials, in pounds per hour, calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance; and
 - m. the daily average coating usage, in gallons per hour.
4. The permittee shall collect and record the following information each month for this emissions unit:
- a. the calculated, controlled VOC emissions from all coatings and cleanup materials, in tons per month;
 - b. the rolling, 12-month summation of VOC emissions from all coatings and cleanup materials, in tons;
 - c. the total volume, in gallons, as applied, of all coatings employed;
 - d. the total volume, in gallons, of all cleanup materials employed;
 - e. the uncontrolled, monthly volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings; and
 - f. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the controlled VOC emission rate shall be calculated using (i) the monthly volume-weighted VOC content recorded in accordance with paragraph (e) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance).
5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the requirements contained in permit to install 04-1059, issued on September 10, 1997: sections A.III.2, A.III.3.a through g, and A.III.4. The monitoring and record keeping requirements contained in the above referenced permit to install are subsumed into the requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the permit to install.

IV. Reporting Requirements

- 1. The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all 3-hour blocks of time during which the permanent total enclosure, when the emissions unit was in operation, was not maintained at an average differential pressure of at least 0.007 inch of water column.
- 2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each calendar month during which the calculated, controlled VOC emission rate exceeded 1.17 pounds of VOC per gallon of coating solids and the actual VOC emission rate for each such month.

IV. Reporting Requirements (continued)

3. The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance.
4. The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.
5. The permittee shall notify the Toledo Division of Environmental Services in writing of each daily record showing that the calculated, controlled VOC emission rate exceeded 4.0 pounds of VOC per gallon of solids. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 45 days after the exceedance occurs.
6. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the calculated, controlled VOC emission rate exceeded 39 lbs/hr, and the actual calculated, controlled VOC emission rate for each such day.
7. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC.
8. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the hourly coating and/or monthly cleanup material limitation(s).
9. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
10. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the requirements contained in permit to install 04-1059, issued on September 10, 1997: sections A.IV.2. through A.IV.4. and sections A.IV.7. through A.IV.9. The reporting requirements contained in the above referenced permit to install are subsumed into the requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the permit to install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

0.14 kg of VOC per liter of coating solids (1.17 pounds of VOC per gallon of coating solids) for each calendar month, or 10 percent of the VOC's applied for each calendar month (90 percent emission reduction), whichever is less restrictive

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.3 and A.III.4, and the overall control efficiency determined during the most recent stack test which demonstrated compliance (98.7 weight percent based on stack testing performed on April 29, 1999). If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 25 of 40 CFR Part 60, Appendix A, and methods and procedures of OAC 3745-21-10(C) and 40 CFR Part 60.466.

USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

For Method 25, the sampling time for each of three runs is to be at least 60 minutes, and the minimum sampling volume is to be at least 0.003 dry standard cubic meter (DSCM); however, shorter sampling times or smaller times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator.

1.b Emission Limitation:

4.0 pounds of VOC per gallon of solids as a daily volume-weighted average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3, and the overall control efficiency determined during the most recent stack test which demonstrated compliance (90% based on the October 18, 1995 stack test). If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 25 of 40 CFR Part 60, Appendix A, and methods and procedures of OAC rule 3745-21-10(C).

USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

V. Testing Requirements (continued)

1.c Emission Limitation:

39.0 lbs/hr of VOC

Applicable Compliance Method:

VOC from the coatings:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3 and the overall control efficiency determined during the most recent stack test which demonstrated compliance (98.7 weight percent based on stack testing performed on April 29, 1999). If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 25 of 40 CFR Part 60, Appendix A, and methods and procedures of OAC rule 3745-21-10(C).

VOC from the oven burners:

Compliance shall be demonstrated based upon the maximum burner capacity of 16 mmBtu/hr, an emission factor of 5.5 pounds of VOC per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This VOC emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 3/98.

If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 25 of 40 CFR Part 60, Appendix A.

1.d Emission Limitation:

170.9 tons of VOC per year

Applicable Compliance Method:

Compliance shall be demonstrated based upon a rolling, summation of monthly emissions calculated in sections A.III.3 and A.III.4.

1.e Emission Limitation:

0.42 lb/hr of CO

Applicable Compliance Method:

Compliance may be demonstrated based upon the maximum burner capacity of 16 mmBtu/hr, an emission factor of 21 pounds of CO per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This CO emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 10/96. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 10 of 40 CFR Part 60, Appendix A.

1.f Emission Limitation:

1.8 tpy of CO

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the CO emission limitation, in lb/hr, by the annual hours of operation for the emissions unit, and then dividing by 2000 lbs/ton.

V. Testing Requirements (continued)

1.g Emission Limitation:

2.0 lbs/hr of NOx

Applicable Compliance Method:

Compliance may be demonstrated based upon the maximum burner capacity of 16 mmBtu, an emission factor of 100 pounds of NOx per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This NOx emission factor is specified in Table 1.4-1 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 2/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 7 of 40 CFR Part 60, Appendix A.

1.h Emission Limitation:

8.8 tpy of NOx

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the NOx emission limitation, in lb/hr, by the annual hours of operation for the emissions unit, and then dividing by 2000 lbs/ton.

1.i Emission Limitation:

0.09 lb/hr of particulate emissions

Applicable Compliance Method:

Compliance may be demonstrated based upon the maximum burner capacity of 16 mmBtu, an emission factor of 1.9 pounds of particulates per million standard cubic feet and a heating value of 1020 Btu per standard cubic foot. This particulate emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 3/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1 through 5 of 40 CFR Part 60, Appendix A and the procedures in OAC rule 3745-17-03(B)(9).

1.j Emission Limitation:

0.4 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission limitation, in lb/hr, by the annual hours of operation for the emissions unit, and then dividing by 2000 lbs/ton.

1.k Emission Limitation:

0.01 lb/hr of SO2

Applicable Compliance Method:

Compliance may be demonstrated based upon the maximum burner capacity of 16 mmBtu, an emission factor of 0.6 pound of SO2 per million standard cubic feet, and a heating value of 1020 Btu per standard cubic foot. This SO2 emission factor is specified in Table 1.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, dated 3/98. If required, the permittee shall also demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Method 6 of 40 CFR Part 60, Appendix A and the procedures in OAC rule 3745-18-04(E).

V. Testing Requirements (continued)

1.l Emission Limitation:

0.05 tpy of SO₂

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the SO₂ emission limitation, in lb/hr, by the annual hours of operation for the emissions unit, and then dividing by 2000 lbs/ton.

1.m Emission Limitation:

100% capture efficiency for the VOC emissions

Applicable Compliance Method:

If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 204 of 40 CFR Part 60, Appendix A and methods and procedures of OAC rule 3745-21-10(C).

1.n Emission Limitation:

90% overall control efficiency for the VOC emissions

Applicable Compliance Method:

If required, the permittee shall perform additional emission tests, conducted in accordance with USEPA Method 25 of 40 CFR Part 60, Appendix A, USEPA Methods 204 through 204F of 40 CFR Part 51, Appendix M, and methods and procedures of OAC rule 3745-21-10(C).

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months after issuance of the permit, approximately 2.5 years after permit issuance, and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the mass emission limitation and the capture efficiency and control efficiency requirements for VOC.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission limitation: for VOC, Method 25 of 40 CFR Part 60, Appendix A. The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations are specified below. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- 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.

V. Testing Requirements (continued)

e. 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.)

f. 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 OAC rule 3745-21-10. 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.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

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>
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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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