



State of Ohio Environmental Protection Agency

Street Address:

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P.O. Box 1049
Columbus, OH 43216-1049

03/18/99

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

08-57-04-0017

Delphi Chassis Systems, Wisconsin Operations
George Kioultzopoulos
1435 Cincinnati Street
P.O. Box 1245
Dayton, OH 45401

Dear George Kioultzopoulos:

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 RAPCA 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 RAPCA.

Very truly yours,

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

cc: USEPA
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
RAPCA
Indiana
Kentucky



Ohio EPA

State of Ohio Environmental Protection Agency

TITLE V PERMIT

Issue Date: 03/18/99

DRAFT

Effective Date:

Expiration Date:

This document constitutes issuance to:

Delphi Chassis Systems, Wisconsin Operations
1420 Wisconsin Blvd.
Dayton, OH 45408

of a Title V permit for Facility ID: 08-57-04-0017

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

B001 (Boiler #1)
Coal fired boiler.

B002 (Boiler #2)
Coal fired boiler.

B003 (Boiler #3)
Natural gas/oil fired boiler.

P005 (Brake Lining Machining)
Brake lining machining.

P008 (Maintenance Painting & Storage)
Maintenance painting and storage.

P064 (Rollcoater & Oven #3)
Rollcoating and baking.

P065 (Rollcoater & Oven #4)
Rollcoating and baking.

P066 (Rollcoater & Oven #5)
Rollcoating and baking.

P098 (Rollcoater & Oven #6)
Rollcoating and baking.

P099 (Rollcoater & Oven #1)
Rollcoating and baking.

P100 (Module 1 - Grinder)
Grinding.

P103 (Module 2 - Grinder)
Grinding.

P106 (Module 3 - Grinder)
Grinding.

P111 (Rollcoater & Oven #2)
Rollcoating and baking.

P115 (Module 4 - Grinder)
Grinding.

P118 (Module 5 - Grinder)
Grinding.

P128 (Asbestos Vestibule Collector)
Asbestos vestibule collector.

P129 (Asbestos Clean-up)
Asbestos clean-up.

P143 (Rollcoater & Oven #7)
Rollcoating and baking.

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:

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

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.

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 units are located at this facility:

G001 - Gasoline & Diesel Dispensing
K001 - Paint Brush Cleaning Tank
P006 - Welding and Machining
P011 - Engine Bearing Broaching
P017 - Cladding Line #2 Sanders
P021,P028 - Vacuum Generation
P033 - Brake Shoe & Rim
P044 - Rack Stripping
P045 - Brake Test
P047 - Tri-plate Line #1
P049 - Engine Bearing Roll Forms
P050 - Bearing Strip Deburr
P055 - Waste water Treatment
P057 - Bulk wash and Phosphate
P060, P085-P087,P090,P125,P152,P139- Batch Cure Ovens
P061 - Slitter Welder
P063 - Engine Bearing
P067,P069,P073-P078, P092 - HEIMS
P079 - Cladding Line # 3
P080-P082,P145 Grinders
P083 - Mix Blend System
P084 - Drill & Counterbore
P089 - Grit Blasting
P091 - Chamfer Grinders
P095 - Press & Cure Basket
P096 - Cold Mold Presses
P101 - Module 1 - Grit blasting
P102 - Module 1 - Powder Coating
P104 - Module 2 - Grit Blasting
P105 - Module 2 - Powder Coating
P107 - Module 3 - Grit Blasting
P108 - Module 3 - Powder Coating
P109 - Rotary Bonder
P110 - Brake Dynamometer
P114 - Grit Blasting(2)
P116 - Module 4 - Grit Blasting
P117 - Module 4 - Powder Coating
P119 - Module 5 - Grit Blasting
P120 - Module 5 - Powder Coating
P122 - Module 6 - Grit Blasting
P123 - Module 6 - Powder Coating
P126 - Rotary HEIM # 1
P130 - Friction Lab
P131 - Mist Collector
P132 - Rotary HEIM #2
P133 - Rotary HEIM #3
P134 - Rotary HEIM #4
P135 - Rotary HEIM #5
P137 - Brake Dynamometer
P138 - Wet Friction Lab
P140 - Paper Segmenters
P141 - Paper Segmenters
P144 - Welding/Brazing Booth
P146 - Model shop
P148, P149, P150 - Cold Cleaner
P151 - Brake Drill/Grind Assembly
P153 - GW Treatment
P154 - Weld/Heat Treating

- B. State Only Enforceable Section**
- Z001 - Welding
 - Z002 - Laminator Press
 - Z003 - Chip Collection
 - Z004 - Lindberg Oven
 - Z005 - Grooving Machines(2)
 - Z007 - Cinci Milacron Machine

B. State Only Enforceable Section (continued)

Z009 - Rotary Bonders
Z011 - Flange Bearing Broach
Z012 - Inspection Stations
Z013 - Parts Cleaners
Z014 - Annealing Oven 2811
Z015 - Annealing Oven 2812
Z016 - Model Shop
Z018 - Belt Sander
Z019 - Curing Oven
Z020 - Clutch Press
Z027 - Pit Furnaces
Z029, Z030 - Tempering Furnace # 1 and #2
Z031, Z043 - Stamping Presses
Z032 - Large Drill Press
Z033 - Grinding Table
Z034 - Belt Sander
Z035 - Endothermic Gas Generator
Z036 - Heat Treat Furnaces
Z037 - Z040, Z042 - Transmat Presses
Z041 - Minister Press
Z044 - Spray Degreaser
Z045 - Cold Headers #4, #6, and #7
Z047, Z051, Z053, Z054 - 500 Ton Presses
Z048, Z049, Z050, Z052 - 6200 Ton Presses
Z055, Z056 - 600 Ton Presses
Z057 - Shoe Press & Weld
Z058 - Welder & Machining
Z059 - Knuckle Specials
Z060 - Knuckle Washing & Drying
Z061 - Deburring
Z062 - Brake Lever Washer
Z063 - Caustic Washer
Z064, Z065 - Hess Mini Washer #1, #2
Z066 - Hess Welder
Z067, Z068, Z070 - Parts Washers
Z069 - Coin Washers
Z075 - Z080 - Cross Wet Machining #1 - #6
Z081 - Hydromation System
Z082, Z084, Z086 - Delco Specials
Z083 - Wheel Cylinder Mach.(5)
Z085, Z008 - Coolant Systems
Z087 - Dry Machining(2)
Z088, Z090 - Wheel Cylinder
Z089 - Backing Plate Assembly
Z092 - Brake Final Assembly
Z093 - Bearingzer Stations
Z094 - Tog- L- Loc Stations
Z095 - SAS Presses
Z098 - Powder Painter
Z099 - Curing Oven
Z100 - Chamfer Machines
Z101 - Glass Blaster
Z102 - NaOH Die Washers (2)
Z104 - Brake Dynamometer
Z105 - Waste Water
Z106 - Caustic Parts Washer
Z107 - Tri-Plate Line #2
Z109 - Presses
Z111 - Spot Welders
Z112 - Engine Test Cells

B. State Only Enforceable Section (continued)

Z113 - Roadways and parking Lots

Z114 - Coal Storage Piles

Z115, Z116 - Emergency Generator

Z117, Z118 - Emergency Fire Pump

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #1 (B001)
Activity Description: Coal fired boiler.

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>
76 mmBtu/hr coal-fired boiler, with wet scrubber	OAC rule 3745-17-10(C)(1)	0.18 pound of particulate emissions per mmBtu of actual heat input
	OAC rule 3745-18-63(D)	1.3 pounds of sulfur dioxide emissions per mmBtu actual heat input
	OAC rule 3745-17-07(A)	Opacity shall not exceed 20 percent, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure drop across the scrubber shall be continuously maintained at a value of no less than 8 inches of water at all times while the emissions unit is in operation.
- The scrubber water flow rate shall be continuously maintained at a value of no less than 190 gallons per minute at all times while the emissions unit is in operation.
- The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I above.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isotherm Bomb Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.
2. The permittee shall maintain monthly records of the total quantity of coal received, the results of the analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate in (lb/mmBtu), based upon a weighted average of the calculated sulfur dioxide emission rates for all shipments of coal during the calendar month.
3. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. The pressure drop across the scrubber, in inches of water, on a once/shift basis.
- b. The scrubber water flow rate, in gallons per minute, on a once/shift basis.
- c. The down time for the control device, monitoring equipment, and the associated emissions unit.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record which shows a deviation of the allowable sulfur dioxide emission limitation, based upon the weighted average sulfur dioxide emission rates from section A.III above. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit written deviation (excursion) reports in accordance with paragraph A.1.c. of the General Terms and Conditions that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
 - a. The static pressure drop across the scrubber.
 - b. The scrubber water flow rate.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a.** Emission Limitation-
0.18 pound particulate emissions per mmBtu actual heat input
- Applicable Compliance Method-
Compliance shall be based on stack testing per OAC rule 3745-17-03(B)(9) [see section A.V.2 below].
- 1.b.** Emission Limitation-
1.3 pounds of sulfur dioxide emissions per mmBtu actual heat input
- Applicable Compliance Method-
Compliance shall be based upon the recordkeeping requirements in Section A.III.2 and the use of the equation contained in OAC rule 3745-18-04(F)(1). If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-18-04(D)(1).
- 1.c.** Emission Limitation-
20% opacity, as a 6-minute average
- Applicable Compliance Method-
Compliance shall be determined by visible emission evaluation performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.
- 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 approximately 2.5 years after permit issuance and within 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): USEPA Reference Method 5 of 40 CFR part 60.
 - 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.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

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: Boiler #2 (B002)
Activity Description: Coal fired boiler.

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>
76 mmBtu/hr coal-fired boiler, with wet scrubber	OAC rule 3745-17-10(C)(1)	0.18 pound of particulate emissions per mmBtu of actual heat input
	OAC rule 3745-18-63(D)	1.3 pounds of sulfur dioxide emissions per mmBtu actual heat input
	OAC rule 3745-17-07(A)	Opacity shall not exceed 20 percent, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure drop across the scrubber shall be continuously maintained at a value of no less than 8 inches of water at all times while the emissions unit is in operation.
- The scrubber water flow rate shall be continuously maintained at a value of no less than 190 gallons per minute at all times while the emissions unit is in operation.
- The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable emission limitation specified in Section A.I above.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isotherm Bomb Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.
2. The permittee shall maintain monthly records of the total quantity of coal received, the results of the analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate in (lb/mmBtu), based upon a weighted average of the calculated sulfur dioxide emission rates for all shipments of coal during the calendar month.
3. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. The pressure drop across the scrubber, in inches of water, on a once/shift basis.
- b. The scrubber water flow rate, in gallons per minute, on a once/shift basis.
- c. The down time for the control device, monitoring equipment, and the associated emissions unit.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record which shows a deviation of the allowable sulfur dioxide emission limitation, based upon the weighted average sulfur dioxide emission rates from section A.III above. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit written deviation (excursion) reports in accordance with paragraph A.1.c. of the General Terms and Conditions that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
 - a. The static pressure drop across the scrubber.
 - b. The scrubber water flow rate.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a.** Emission Limitation-
0.18 pound particulate emissions per mmBtu actual heat input
- Applicable Compliance Method-
Compliance shall be based on stack testing per OAC rule 3745-17-03(B)(9) [see section A.V.2 below].
- 1.b.** Emission Limitation-
1.3 pounds of sulfur dioxide emissions per mmBtu actual heat input
- Applicable Compliance Method-
Compliance shall be based upon the recordkeeping requirements in Section A.III.2 and the use of the equation contained in OAC rule 3745-18-04(F)(1). If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-18-04(D)(1).
- 1.c.** Emission Limitation-
20% opacity, as a 6-minute average
- Applicable Compliance Method-
Compliance shall be determined by visible emission evaluation performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.
- 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 approximately 2.5 years after permit issuance and within 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): USEPA Reference Method 5 of 40 CFR part 60.
 - 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.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

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: Boiler #3 (B003)
Activity Description: Natural gas/oil fired boiler.

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 mmBtu/hr natural gas/No. 2 oil-fired boiler	OAC rule 3745-17-10(B)(1)	0.020 pound of particulate emissions per mmBtu actual heat input
	OAC rule 3745-17-07(A)	Opacity shall not exceed 20 percent, as a six-minute average, except as provided by rule.
	OAC rule 3745-18-06(D)	1.6 pounds sulfur dioxide/mmBtu of actual heat input, whenever number 2 fuel oil is employed

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall burn only natural gas and/or number two fuel oil in this emissions unit.
- The quality of oil burned in this emissions unit shall meet, on an as-received basis, a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 lbs of sulfur dioxide/mmBtu of actual heat input.

III. Monitoring and/or Record Keeping Requirements

- For each day during which the permittee burns a fuel other than natural gas and /or number two fuel oil, the permittee shall maintain a record of the type and quality of fuel burned in this emissions unit.

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

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier. Also, if necessary, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of oil during a calendar month.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record which shows a deviation of the allowable sulfur dioxide limitation specified in Section A.1 based upon a volume-weighted average of the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the deviation occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - 1.a. Emission Limitation-
0.020 pound particulate emissions per mmBtu actual heat input

Applicable Compliance Method-

When firing natural gas, compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.036 mmcu.ft/hr) by the AP-42 factor for natural gas (6.2 lbs particulates/mmcu.ft), and dividing by the maximum hourly heat input capacity of the emissions unit (36 mmBtu/hr).

When firing oil, compliance shall be based upon an emission factor of 2 lbs particulates/1000 gallon of oil, as specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-2.

If required, the permittee shall demonstrate compliance with this emission limitation (when firing # 2 fuel oil) in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

- 1.b. Emission Limitation-
20% opacity, as a 6-minute average

Applicable Compliance Method-

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

V. Testing Requirements (continued)

1.c Emission Limitation: 1.6 pounds sulfur dioxide/mmBtu of actual heat input

Applicable Compliance Method: When firing fuel oil, except as provided below, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

If the sulfur content of each shipment of oil received during a calendar month does not comply with the allowable emission limitation on an "as-received" basis, compliance with the allowable sulfur dioxide emission limitation shall be based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil during the calendar month.

When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with this emission limitation (when firing # 2 fuel oil) in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 6C.

VI. Miscellaneous Requirements

None

B. State 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 mmBtu/hr natural gas fired boiler	OAC rule 3745-31-05 PTI 08-171	3.15 tons/yr particulates

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

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

Emission Limitation-
3.15 tons/yr particulates

Applicable Compliance Method-

The 3.15 tons/yr limitation was developed by multiplying the allowable emissions rate of 0.020 lb particulates/mmBtu by the maximum hourly heat input capacity of 36 mmBtu/hr. Then the resulting 0.72 lb/hr was multiplied by the maximum operating schedule of 8,760 hrs/yr and divided by 2,000 lbs/ton. Therefore, provided compliance is shown with the lb/mmBtu limitation, compliance will also be shown with the annual limitation.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Brake Lining Machining (P005)
Activity Description: Brake lining machining.

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>
brake lining machining, with fabric filter	OAC rule 3745-17-11(B)(1)	5.1 lbs/hr particulates
	OAC rule 3745-17-07(A)	less stringent than the limitation based on the NESHAP
	40 CFR Part 61, Subpart M	See A.I.2.

2. Additional Terms and Conditions

- 2.a The permittee shall discharge no visible emissions to the outside air from any of the operations of from any building or structure in which these manufacturing operations are conducted or from any other associated fugitive sources.
- 2.b There shall be no visible emissions to the outside air during the collection, processing (including incineration), packaging, or transporting of any asbestos-containing waste material generated by this emissions unit, in accordance with 40 CFR Part 61.150(a).
- 2.c This emissions unit shall be continuously controlled through the application of a fabric filter as specified in 40 CFR Part 61.152.

II. Operational Restrictions

1. The permittee shall properly operate and maintain the fabric filter control device. Bypass devices may be used only during upset or emergency conditions and then only for so long as it takes to shut down the operation generating the particulate asbestos material.
2. In the event of upset or emergency conditions relating to the fabric filter, the permittee shall vent all emissions through a HEPA filter bypass that is certified to be at least 99.97 percent efficient for 0.3 micron particles.
3. All asbestos containing waste material shall be deposited as soon as practical by the permittee at either:
 - a. a waste disposal site operated in accordance with the provisions of 40 CFR Part 61.154; or
 - b. an EPA-approved site that converts regulated asbestos-containing material (RACM) and asbestos containing waste material into non-asbestos material according to the provisions of 40 CFR Part 61.155.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor each potential source of asbestos emissions from any part of this emissions unit, including air cleaning devices, process equipment, and buildings that house equipment for material processing and handling, at least once per day, during the daylight hours, for visible emissions to the outside air during periods of operation. The monitoring shall be by visual observations of at least 15 seconds duration per source of emissions.
2. The permittee shall inspect the fabric filter at least once each week for proper operation, for changes that signal the potential for malfunctions, including, to the maximum extent possible without dismantling other than opening the device, the presence of tears, holes, and abrasions in filter bags, and for dust deposits on the clean side of the bags.
3. The permittee shall maintain records of the results of visible emission monitoring and air cleaning device inspections. These records shall include:
 - a. Date and time of each inspection.
 - b. Presence or absence of visible emissions.
 - c. Condition of fabric filters, including the presence of any tears, holes, and abrasions.
 - d. Presence of dust deposits on clean side of fabric filters.
 - e. Brief description of corrective actions taken, including date and time.
 - f. Daily hours of operation for the fabric filter.
4. The permittee shall maintain waste shipment records that include the following information:
 - a. The name, address, and telephone number of the waste generator.
 - b. The name and address of the local, state, or EPA Regional office responsible for administering the asbestos NESHAP program.
 - c. The approximate quantity in cubic meters (or cubic yards).
 - d. The name and telephone number of the disposal site operator.
 - e. The name and physical site location of the disposal site.
 - f. The date transported.
 - g. The name, address, and telephone number of the transporter(s).
 - h. A certification that the contents of this consignment are fully and accurately described by proper shipping name, are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of operation for the emissions unit during which visible emissions occurred and shall include a copy of the visible emission monitoring records which show the deviations for that quarter. These deviation (excursion) reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions.

IV. Reporting Requirements (continued)

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a copy of the waste shipment record, signed by the owner or operator of the designated waste disposal site, is not received by the waste generator within 45 days of the date the waste was accepted by the initial transporter. This notification shall include:
 - a. A copy of the waste shipment record for which a confirmation of delivery was not received.
 - b. A cover letter signed by the waste generator explaining the efforts taken to locate the asbestos waste shipment and the results of those efforts.

V. Testing Requirements

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

Emissions Limitation -
5.1 lbs/hour particulates

Applicable Compliance Method -
If required, compliance with this mass emissions limitation shall be based on stack testing per OAC rule 3745-17-03(B)(10).
- 1.b Emissions Limitation -
no visible emissions

Applicable Compliance Method -
Compliance shall be determined by visible emission evaluations performed in accordance with Method 22 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall ensure that vehicles used to transport asbestos-containing waste material are marked during the loading and unloading of waste so that the signs are visible. The markings must conform to the requirements of 40 CFR Part 61.149(d)(1).
2. The permittee shall provide a copy of the waste shipment records, as described in A.III.5., to the disposal site owners or operators at the same time as the asbestos-containing waste material is delivered to the disposal site.
3. For waste shipments where a copy of the waste shipment record, signed by the owner or operator of the designated disposal site, is not received by the waste generator within 35 days of the date the waste was accepted by the initial transporter, the permittee shall contact the transporter and/or the owner or operator of the designated disposal site to determine the status of the waste shipment.
4. The permittee shall be permitted to use alternative fabric filter control devices provided the equipment meets the minimum requirements of 40 CFR Part 61, Subpart M.

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: Maintenance Painting & Storage (P008)
Activity Description: Maintenance painting and storage.

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>
maintenance painting & storage	OAC rule 3745-21-09(U)(2)(e)(i)	On any day when coating metal parts, less than or equal to 8 gallons/day coating usage for the coatings used for the metal parts
	OAC rule 3745-21-07(G)(2)	On any day when coating non-metal parts, 8 lbs/hour and 40 lbs/day organic compounds for the coatings and photochemically reactive cleanup materials used for the non-metal parts
	OAC rule 3745-17-11	0.551 lb particulate/hr
	OAC rule 3745-17-07(A)	Opacity shall not exceed 20 percent, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. On any day when coating metal parts, the permittee shall collect and record the following information each day for this emissions unit for the coatings used for the metal parts:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed .
 - c. The total volume, in gallons, of all coatings employed.

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

2. On any day when coating non-metal parts, the permittee shall collect and record the following information each day for this emissions unit for the coatings used for the non-metal parts:
 - a. The name and identification number of each coating and photochemically reactive cleanup material employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The volume, in gallons, of each photochemically reactive cleanup material employed.
 - d. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - e. The organic compound emission rate for all coatings and photochemically reactive cleanup materials employed, in pounds.
 - f. The total number of hours the emissions unit was in operation.
 - g. The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials employed, i.e., (e)/(f), in pounds per hour (average).
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. On any day when coating metal parts, the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that this emissions unit employed more than the applicable maximum daily coating usage restriction (gallons/day) to coat metal parts. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. On any day when coating non-metal parts, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials used for the non-metal parts exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. On any day when coating non-metal parts, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials used for the non-metal parts exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c. of the General Terms and Conditions.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emissions Limitation -
on any day when coating metal parts, less than or equal to 8 gallons/day coating usage for the coatings used for the metal parts

Applicable Compliance Method -
Compliance shall be based upon the record keeping specified in A.III.1.

- 1.b** Emissions Limitation -
on any day when coating non-metal parts, 8 lbs/hour and 40 lbs/day organic compounds for the coatings and cleanup materials used for the non-metal parts

Applicable Compliance Method -
Compliance shall be based upon the record keeping specified in A.III.2.

- 1.c** Emission Limitation-
0.551 lbs particulate matter/hr

Applicable Compliance Method-
To determine the actual worst case emissions rate for particulate matter, the following equation shall be used:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

$$E = \text{particulate matter emissions rate (lbs/hr)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

- 1.d** Emissions Limitation -
20% opacity, as a six-minute average

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

- 2.** Formulation data or USEPA Method 24 shall be used to determine the OC contents for all coatings and cleanup materials.

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: Rollcoater & Oven #3 (P064)
Activity Description: Rollcoating and baking.

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>
rollcoater # 3; coating of metal parts with adhesive	OAC rule 3745-31-05 PTI 08-2352	See A.I.2.a.
	OAC rule 3745-21-09(U)(2)(e)(i)	less than or equal to 8 gallons/day of coating usage

2. Additional Terms and Conditions

- 2.a** The monthly volatile organic compound (VOC) emission rate for the seven rollcoater operations (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 3.31 tons, including cleanup.

II. Operational Restrictions

- The daily coating usage for this emissions unit shall not exceed 8 gallons.
- The annual coating usage for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 10,200 gallons.
- The annual cleanup material usage for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 2,400 gallons.
- The VOC content of each adhesive coating employed in this emissions unit shall not exceed 6.0 pounds VOC per gallon of coating, as applied.
- The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.6 pounds per gallon.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, as applied, in pounds per gallon.
 - e. The VOC content of each cleanup material employed, in pounds per gallon.
2. The permittee shall collect and record the following information each month for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each coating and cleanup material, in pounds per gallon.
 - d. The total volume, in gallons, of all coatings employed.
 - e. The total volume, in gallons, of all cleanup materials employed.
 - f. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that this emissions unit employed more than the applicable daily coating usage restriction. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which summarize the following:
 - a. the actual total coating usage, in gallons/year, for emissions units P064, P065, P066, P098, P099, P111 and P143 combined; and
 - b. the actual total cleanup material usage, in gallons/year, for emissions units P064, P065, P066, P098, P099, P111 and P143 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. In accordance with paragraph A.1.c of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which identify each month during which the total VOC emission rate from all coatings and cleanup materials for the combined emissions units exceeded 3.31 tons per month, and the total VOC emissions for each such month.
4. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing the use of any noncomplying coating or cleanup material, as specified in section A.II.4 and 5 of this permit for VOC content. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days following the end of the month.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitation-
less than or equal to 8 gallons/day of coating usage

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.1.

- 1.b** Emission Limitation-
3.31 tons/month VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.2.

- 1.c** Emission Limitation:
6.0 pounds VOC/gallon -coatings
7.6 pounds VOC/gallon- cleanup materials

Applicable Compliance Method:
Compliance shall be based on the record keeping specified in section A.III.1. of this permit.

USEPA Method 24 shall be used to determine the VOC contents for the 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 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.

- 1.d** Emission Limitation:
10,200 gallons/year - coatings (combined)
2,400 gallon/year - cleanup materials (combined)

Applicable Compliance Method:

Compliance with the above gallon usage restrictions shall be based upon the record keeping requirements, as specified in section A.III.2 of this permit and shall be the sum of the monthly coating and cleanup material usages for the previous calendar year.

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>
rollcoater # 3; coating of metal parts with adhesive	OAC 3745-31-05 PTI 08-2352	See B.I.2.a.

2. Additional Terms and Conditions

- 2.a The maximum annual volatile organic compound (VOC) emissions rate for the seven rollcoater operations (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 39.72 tons/yr, including cleanup.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. See A.III.

IV. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit and the 6 other rollcoaters identified above for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

Emission Limitation-
39.72 tons/yr VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.2. and shall be the sum of the monthly VOC emission rates for the calendar year.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rollcoater & Oven #4 (P065)
Activity Description: Rollcoating and baking.

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>
rollcoater # 4; coating of metal parts with adhesive	OAC rule 3745-31-05 PTI 08-2352	See A.I.2.a.
	OAC rule 3745-21-09(U)(2)(e)(i)	less than or equal to 8 gallons/day of coating usage

2. Additional Terms and Conditions

- The monthly volatile organic compound (VOC) emission rate for the seven rollcoater operations (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 3.31 tons, including cleanup.

II. Operational Restrictions

- The daily coating usage for this emissions unit shall not exceed 8 gallons.
- The annual coating usage for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 10,200 gallons.
- The annual cleanup material usage for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 2,400 gallons.
- The VOC content of each adhesive coating employed in this emissions unit shall not exceed 6.0 pounds VOC per gallon of coating, as applied.
- The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.6 pounds per gallon.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, as applied, in pounds per gallon.
 - e. The VOC content of each cleanup material employed, in pounds per gallon.
2. The permittee shall collect and record the following information each month for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each coating and cleanup material, in pounds per gallon.
 - d. The total volume, in gallons, of all coatings employed.
 - e. The total volume, in gallons, of all cleanup materials employed.
 - f. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that this emissions unit employed more than the applicable daily coating usage restriction. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which summarize the following:
 - a. the actual total coating usage, in gallons/year, for emissions units P064, P065, P066, P098, P099, P111 and P143 combined; and
 - b. the actual total cleanup material usage, in gallons/year, for emissions units P064, P065, P066, P098, P099, P111 and P143 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. In accordance with paragraph A.1.c of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which identify each month during which the total VOC emission rate from all coatings and cleanup materials for the combined emissions units exceeded 3.31 tons per month, and the total VOC emissions for each such month.
4. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing the use of any noncomplying coating or cleanup material, as specified in section A.II.4 and 5 of this permit for VOC content. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days following the end of the month.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitation-
less than or equal to 8 gallons/day of coating usage

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.1.

- 1.b** Emission Limitation-
3.31 tons/month VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.2.

- 1.c** Emission Limitation:
6.0 pounds VOC/gallon -coatings
7.6 pounds VOC/gallon- cleanup materials

Applicable Compliance Method:
Compliance shall be based on the record keeping specified in section A.III.1. of this permit.

USEPA Method 24 shall be used to determine the VOC contents for the 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 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.

- 1.d** Emission Limitation:
10,200 gallons/year - coatings (combined)
2,400 gallon/year - cleanup materials (combined)

Applicable Compliance Method:

Compliance with the above gallon usage restrictions shall be based upon the record keeping requirements, as specified in section A.III.2 of this permit and shall be the sum of the monthly coating and cleanup material usages for the previous calendar year.

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>
rollcoater # 4; coating of metal parts with adhesive	OAC 3745-31-05 PTI 08-2352	See B.I.2.a.

2. Additional Terms and Conditions

- 2.a The maximum annual volatile organic compound (VOC) emissions rate for the seven rollcoater operations (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 39.72 tons/yr, including cleanup.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. See A.III.

IV. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit and the 6 other rollcoaters identified above for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

Emission Limitation-
39.72 tons/yr VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.2. and shall be the sum of the monthly VOC emission rates for the calendar year.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rollcoater & Oven #5 (P066)
Activity Description: Rollcoating and baking.

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>
rollcoater # 5; coating of metal parts with adhesive	OAC rule 3745-31-05 PTI 08-2352	See A.I.2.a.
	OAC rule 3745-21-09(U)(2)(e)(i)	less than or equal to 8 gallons/day of coating usage

2. Additional Terms and Conditions

- The monthly volatile organic compound (VOC) emission rate for the seven rollcoater operations (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 3.31 tons, including cleanup.

II. Operational Restrictions

- The daily coating usage for this emissions unit shall not exceed 8 gallons.
- The annual coating usage for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 10,200 gallons.
- The annual cleanup material usage for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 2,400 gallons.
- The VOC content of each adhesive coating employed in this emissions unit shall not exceed 6.0 pounds VOC per gallon of coating, as applied.
- The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.6 pounds per gallon.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, as applied, in pounds per gallon.
 - e. The VOC content of each cleanup material employed, in pounds per gallon.
2. The permittee shall collect and record the following information each month for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each coating and cleanup material, in pounds per gallon.
 - d. The total volume, in gallons, of all coatings employed.
 - e. The total volume, in gallons, of all cleanup materials employed.
 - f. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that this emissions unit employed more than the applicable daily coating usage restriction. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which summarize the following:
 - a. the actual total coating usage, in gallons/year, for emissions units P064, P065, P066, P098, P099, P111 and P143 combined; and
 - b. the actual total cleanup material usage, in gallons/year, for emissions units P064, P065, P066, P098, P099, P111 and P143 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. In accordance with paragraph A.1.c of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which identify each month during which the total VOC emission rate from all coatings and cleanup materials for the combined emissions units exceeded 3.31 tons per month, and the total VOC emissions for each such month.
4. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing the use of any noncomplying coating or cleanup material, as specified in section A.II.4 and 5 of this permit for VOC content. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days following the end of the month.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitation-
less than or equal to 8 gallons/day of coating usage

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.1.

- 1.b** Emission Limitation-
3.31 tons/month VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.2.

- 1.c** Emission Limitation:
6.0 pounds VOC/gallon -coatings
7.6 pounds VOC/gallon- cleanup materials

Applicable Compliance Method:
Compliance shall be based on the record keeping specified in section A.III.1. of this permit.

USEPA Method 24 shall be used to determine the VOC contents for the 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 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.

- 1.d** Emission Limitation:
10,200 gallons/year - coatings (combined)
2,400 gallon/year - cleanup materials (combined)

Applicable Compliance Method:

Compliance with the above gallon usage restrictions shall be based upon the record keeping requirements, as specified in section A.III.2 of this permit and shall be the sum of the monthly coating and cleanup material usages for the previous calendar year.

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>
rollcoater # 5; coating of metal parts with adhesive	OAC 3745-31-05 PTI 08-2352	See B.I.2.a.

2. Additional Terms and Conditions

- 2.a The maximum annual volatile organic compound (VOC) emissions rate for the seven rollcoater operations (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 39.72 tons/yr, including cleanup.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. See A.III.

IV. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit and the 6 other rollcoaters identified above for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

Emission Limitation-
39.72 tons/yr VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.2. and shall be the sum of the monthly VOC emission rates for the calendar year.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rollcoater & Oven #6 (P098)
Activity Description: Rollcoating and baking.

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>
rollcoater # 6; coating of metal parts with adhesive	OAC rule 3745-31-05 PTI 08-2352	See A.I.2.a.
	OAC rule 3745-21-09(U)(2)(e)(i)	less than or equal to 8 gallons/day of coating usage

2. Additional Terms and Conditions

- The monthly volatile organic compound (VOC) emission rate for the seven rollcoater operations (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 3.31 tons, including cleanup.

II. Operational Restrictions

- The daily coating usage for this emissions unit shall not exceed 8 gallons.
- The annual coating usage for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 10,200 gallons.
- The annual cleanup material usage for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 2,400 gallons.
- The VOC content of each adhesive coating employed in this emissions unit shall not exceed 6.0 pounds VOC per gallon of coating, as applied.
- The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.6 pounds per gallon.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, as applied, in pounds per gallon.
 - e. The VOC content of each cleanup material employed, in pounds per gallon.
2. The permittee shall collect and record the following information each month for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each coating and cleanup material, in pounds per gallon.
 - d. The total volume, in gallons, of all coatings employed.
 - e. The total volume, in gallons, of all cleanup materials employed.
 - f. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that this emissions unit employed more than the applicable daily coating usage restriction. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which summarize the following:
 - a. the actual total coating usage, in gallons/year, for emissions units P064, P065, P066, P098, P099, P111 and P143 combined; and
 - b. the actual total cleanup material usage, in gallons/year, for emissions units P064, P065, P066, P098, P099, P111 and P143 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. In accordance with paragraph A.1.c of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which identify each month during which the total VOC emission rate from all coatings and cleanup materials for the combined emissions units exceeded 3.31 tons per month, and the total VOC emissions for each such month.
4. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing the use of any noncomplying coating or cleanup material, as specified in section A.II.4 and 5 of this permit for VOC content. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days following the end of the month.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitation-
less than or equal to 8 gallons/day of coating usage

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.1.

- 1.b** Emission Limitation-
3.31 tons/month VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.2.

- 1.c** Emission Limitation:
6.0 pounds VOC/gallon -coatings
7.6 pounds VOC/gallon- cleanup materials

Applicable Compliance Method:
Compliance shall be based on the record keeping specified in section A.III.1. of this permit.

USEPA Method 24 shall be used to determine the VOC contents for the 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 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.

- 1.d** Emission Limitation:
10,200 gallons/year - coatings (combined)
2,400 gallon/year - cleanup materials (combined)

Applicable Compliance Method:

Compliance with the above gallon usage restrictions shall be based upon the record keeping requirements, as specified in section A.III.2 of this permit and shall be the sum of the monthly coating and cleanup material usages for the previous calendar year.

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>
rollcoater # 6; coating of metal parts with adhesive	OAC 3745-31-05 PTI 08-2352	See B.I.2.a.

2. Additional Terms and Conditions

- 2.a The maximum annual volatile organic compound (VOC) emissions rate for the seven rollcoater operations (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 39.72 tons/yr, including cleanup.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. See A.III.

IV. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit and the 6 other rollcoaters identified above for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

Emission Limitation-
39.72 tons/yr VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.2. and shall be the sum of the monthly VOC emission rates for the calendar year.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rollcoater & Oven #1 (P099)
Activity Description: Rollcoating and baking.

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>
rollcoater # 1; coating of metal parts with adhesive	OAC rule 3745-31-05 PTI 08-2352	See A.I.2.a.
	OAC rule 3745-21-09(U)(2)(e)(i)	less than or equal to 8 gallons/day of coating usage

2. Additional Terms and Conditions

- 2.a The monthly volatile organic compound (VOC) emission rate for the seven rollcoater operations (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 3.31 tons, including cleanup.

II. Operational Restrictions

1. The daily coating usage for this emissions unit shall not exceed 8 gallons.
2. The annual coating usage for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 10,200 gallons.
3. The annual cleanup material usage for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 2,400 gallons.
4. The VOC content of each adhesive coating employed in this emissions unit shall not exceed 6.0 pounds VOC per gallon of coating, as applied.
5. The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.6 pounds per gallon.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, as applied, in pounds per gallon.
 - e. The VOC content of each cleanup material employed, in pounds per gallon.
2. The permittee shall collect and record the following information each month for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each coating and cleanup material, in pounds per gallon.
 - d. The total volume, in gallons, of all coatings employed.
 - e. The total volume, in gallons, of all cleanup materials employed.
 - f. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that this emissions unit employed more than the applicable daily coating usage restriction. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which summarize the following:
 - a. the actual total coating usage, in gallons/year, for emissions units P064, P065, P066, P098, P099, P111 and P143 combined; and
 - b. the actual total cleanup material usage, in gallons/year, for emissions units P064, P065, P066, P098, P099, P111 and P143 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. In accordance with paragraph A.1.c of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which identify each month during which the total VOC emission rate from all coatings and cleanup materials for the combined emissions units exceeded 3.31 tons per month, and the total VOC emissions for each such month.
4. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing the use of any noncomplying coating or cleanup material, as specified in section A.II.4 and 5 of this permit for VOC content. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days following the end of the month.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitation-
less than or equal to 8 gallons/day of coating usage

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.1.

- 1.b** Emission Limitation-
3.31 tons/month VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.2.

- 1.c** Emission Limitation:
6.0 pounds VOC/gallon -coatings
7.6 pounds VOC/gallon- cleanup materials

Applicable Compliance Method:
Compliance shall be based on the record keeping specified in section A.III.1. of this permit.

USEPA Method 24 shall be used to determine the VOC contents for the 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 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.

- 1.d** Emission Limitation:
10,200 gallons/year - coatings (combined)
2,400 gallon/year - cleanup materials (combined)

Applicable Compliance Method:

Compliance with the above gallon usage restrictions shall be based upon the record keeping requirements, as specified in section A.III.2 of this permit and shall be the sum of the monthly coating and cleanup material usages for the previous calendar year.

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>
rollcoater # 1; coating of metal parts with adhesive	OAC 3745-31-05 PTI 08-2352	See B.I.2.a.

2. Additional Terms and Conditions

- 2.a The maximum annual volatile organic compound (VOC) emissions rate for the seven rollcoater operations (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 39.72 tons/yr, including cleanup.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. See A.III.

IV. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit and the 6 other rollcoaters identified above for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

Emission Limitation-
39.72 tons/yr VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.2. and shall be the sum of the monthly VOC emission rates for the calendar year.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Module 1 - Grinder (P100)
Activity Description: Grinding.

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>
module 1-grinder, with baghouse	OAC rule 3745-17-11(B)(1)	3.1 lbs/hr particulates
	OAC rule 3745-17-07(A)	Opacity shall not exceed 20 percent, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained within the range of 0.5 to 10 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

IV. Reporting Requirements

- The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

V. Testing Requirements

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

Emission Limitation-
3.1 lbs/hr particulates

Applicable Compliance Method-
Compliance shall be determined by multiplying the emission factor of 17 lbs particulates/ton (AP-42 Table 12.10-7) by the maximum production rate of (0.64 ton/hr) and the control efficiency of the baghouse (1-0.99). If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(10).

Emission Limitation-
20% opacity, as a 6-minute average

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

VI. Miscellaneous Requirements

None

B. State 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>
module 1-grinder, with bagouse	OAC rule 3745-31-05 PTI 08-903	13.36 tons/yr particulates 5% opacity, as a six-minute average

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

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

Emission Limitation-
13.36 tons/yr particulate

Applicable Compliance Method-
The tons/yr limitation was developed by multiplying the 3.05 lbs/hr limitation by the maximum operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emission Limitation-
5% opacity, as a 6-minute average

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

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Module 2 - Grinder (P103)
Activity Description: Grinding.

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>
module 2-grinder, with baghouse	OAC rule 3745-17-11(B)(1)	5.0 lbs/hr particulates
	OAC rule 3745-17-07(A)	Opacity shall not exceed 20 percent, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained within the range of 0.5 to 10 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

IV. Reporting Requirements

- The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

V. Testing Requirements

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

Emission Limitation-
5.0 lbs/hr particulates

Applicable Compliance Method-
Compliance shall be determined by multiplying the emission factor of 17 lbs particulates/ton (AP-42 Table 12.10-7) by the maximum production rate of (1.35 tons/hr) and the control efficiency of the baghouse (1-0.99). If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(10).

Emission Limitation-
20% opacity, as a 6-minute average

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

VI. Miscellaneous Requirements

None

B. State 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>
module 2-grinder, with baghouse	OAC rule 3745-31-05 PTI 08-903	21.94 tons/yr particulates 5% opacity, as a six-minute average

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

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

Emission Limitation-
21.94 tons/yr particulate

Applicable Compliance Method-
The tons/yr limitation was developed by multiplying the 5.0 lbs/hr limitation by the maximum operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emission Limitation-
5% opacity, as a 6-minute average

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

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Module 3 - Grinder (P106)
Activity Description: Grinding.

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>
module 3-grinder, with baghouse	OAC rule 3745-17-11(B)(1)	5.0 lbs/hr particulates
	OAC rule 3745-17-07(A)	Opacity shall not exceed 20 percent, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained within the range of 0.5 to 10 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

IV. Reporting Requirements

- The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

V. Testing Requirements

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

Emission Limitation-
5.0 lbs/hr particulates

Applicable Compliance Method-
Compliance shall be determined by multiplying the emission factor of 17 lbs particulates/ton (AP-42 Table 12.10-7) by the maximum production rate of (1.35 tons/hr) and the control efficiency of the baghouse (1-0.99). If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(10).

Emission Limitation-
20% opacity, as a 6-minute average

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

VI. Miscellaneous Requirements

None

B. State 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>
module 3-grinder, with baghouse	OAC rule 3745-31-05 PTI 08-903	21.94 tons/yr particulates 5% opacity, as a six-minute average

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

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

Emission Limitation-
21.94 tons/yr particulate

Applicable Compliance Method-
The tons/yr limitation was developed by multiplying the 5.0 lbs/hr limitation by the maximum operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emission Limitation-
5% opacity, as a 6-minute average

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

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rollcoater & Oven #2 (P111)
Activity Description: Rollcoating and baking.

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>
rollcoater # 2; coating of metal parts with adhesive	OAC rule 3745-31-05 PTI 08-2352	See A.I.2.a.
	OAC rule 3745-21-09(U)(2)(e)(i)	less than or equal to 8 gallons/day of coating usage

2. Additional Terms and Conditions

- 2.a** The monthly volatile organic compound (VOC) emission rate for the seven rollcoater operations (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 3.31 tons, including cleanup.

II. Operational Restrictions

- The daily coating usage for this emissions unit shall not exceed 8 gallons.
- The annual coating usage for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 10,200 gallons.
- The annual cleanup material usage for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 2,400 gallons.
- The VOC content of each adhesive coating employed in this emissions unit shall not exceed 6.0 pounds VOC per gallon of coating, as applied.
- The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.6 pounds per gallon.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Module 4 - Grinder (P115)
Activity Description: Grinding.

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>
module 4-grinder, with baghouse	OAC rule 3745-17-11(B)(1)	5.0 lbs/hr particulates
	OAC rule 3745-17-07(A)	Opacity shall not exceed 20 percent, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained within the range of 0.5 to 10 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

IV. Reporting Requirements

- The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

V. Testing Requirements

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

Emission Limitation-
5.0 lbs/hr particulates

Applicable Compliance Method-
Compliance shall be determined by multiplying the emission factor of 17 lbs particulates/ton (AP-42 Table 12.10-7) by the maximum production rate of (1.35 tons/hr) and the control efficiency of the baghouse (1-0.99). If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(10).

Emission Limitation-
20% opacity, as a 6-minute average

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

VI. Miscellaneous Requirements

None

B. State 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>
module 4-grinder, with baghouse	OAC rule 3745-31-05 PTI 08-903	21.94 tons/yr particulates 5% opacity, as a six-minute average

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

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

Emission Limitation-
21.94 tons/yr particulate

Applicable Compliance Method-
The tons/yr limitation was developed by multiplying the 5.0 lbs/hr limitation by the maximum operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emission Limitation-
5% opacity, as a 6-minute average

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

VI. Miscellaneous Requirements

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, as applied, in pounds per gallon.
 - e. The VOC content of each cleanup material employed, in pounds per gallon.
2. The permittee shall collect and record the following information each month for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each coating and cleanup material, in pounds per gallon.
 - d. The total volume, in gallons, of all coatings employed.
 - e. The total volume, in gallons, of all cleanup materials employed.
 - f. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that this emissions unit employed more than the applicable daily coating usage restriction. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which summarize the following:
 - a. the actual total coating usage, in gallons/year, for emissions units P064, P065, P066, P098, P099, P111 and P143 combined; and
 - b. the actual total cleanup material usage, in gallons/year, for emissions units P064, P065, P066, P098, P099, P111 and P143 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. In accordance with paragraph A.1.c of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which identify each month during which the total VOC emission rate from all coatings and cleanup materials for the combined emissions units exceeded 3.31 tons per month, and the total VOC emissions for each such month.
4. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing the use of any noncomplying coating or cleanup material, as specified in section A.II.4 and 5 of this permit for VOC content. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days following the end of the month.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitation-
less than or equal to 8 gallons/day of coating usage

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.1.

- 1.b** Emission Limitation-
3.31 tons/month VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.2.

- 1.c** Emission Limitation:
6.0 pounds VOC/gallon -coatings
7.6 pounds VOC/gallon- cleanup materials

Applicable Compliance Method:
Compliance shall be based on the record keeping specified in section A.III.1. of this permit.

USEPA Method 24 shall be used to determine the VOC contents for the 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 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.

- 1.d** Emission Limitation:
10,200 gallons/year - coatings (combined)
2,400 gallon/year - cleanup materials (combined)

Applicable Compliance Method:

Compliance with the above gallon usage restrictions shall be based upon the record keeping requirements, as specified in section A.III.2 of this permit and shall be the sum of the monthly coating and cleanup material usages for the previous calendar year.

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>
rollcoater # 2; coating of metal parts with adhesive	OAC 3745-31-05 PTI 08-2352	See B.I.2.a.

2. Additional Terms and Conditions

- 2.a The maximum annual volatile organic compound (VOC) emissions rate for the seven rollcoater operations (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 39.72 tons/yr, including cleanup.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. See A.III.

IV. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit and the 6 other rollcoaters identified above for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

Emission Limitation-
39.72 tons/yr VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.2. and shall be the sum of the monthly VOC emission rates for the calendar year.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Module 5 - Grinder (P118)
Activity Description: Grinding.

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>
module 5-grinder, with baghouse	OAC rule 3745-17-11(B)(1)	5.0 lbs/hr particulates
	OAC rule 3745-17-07(A)	Opacity shall not exceed 20 percent, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained within the range of 0.5 to 10 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

IV. Reporting Requirements

- The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

V. Testing Requirements

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

Emission Limitation-
5.0 lbs/hr particulates

Applicable Compliance Method-
Compliance shall be determined by multiplying the emission factor of 17 lbs particulates/ton (AP-42 Table 12.10-7) by the maximum production rate of (1.35 tons/hr) and the control efficiency of the baghouse (1-0.99). If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(10).

Emission Limitation-
20% opacity, as a 6-minute average

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

VI. Miscellaneous Requirements

None

B. State 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>
module 5-grinder, with baghouse	OAC rule 3745-31-05 PTI 08-903	21.94 tons/yr particulates 5% opacity, as a six-minute average

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

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

Emission Limitation-
21.94 tons/yr particulate

Applicable Compliance Method-
The tons/yr limitation was developed by multiplying the 5.0 lbs/hr limitation by the maximum operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emission Limitation-
5% opacity, as a 6-minute average

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

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Asbestos Vestibule Collector (P128)
Activity Description: Asbestos vestibule collector.

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>
asbestos vestibule collector, with baghouse control	40 CFR Part 61, Subpart M	See A.I.2.

2. Additional Terms and Conditions

- 2.a The permittee shall discharge no visible emissions to the outside air from any of the operations of from any building or structure in which these manufacturing operations are conducted or from any other associated fugitive sources.
- 2.b There shall be no visible emissions to the outside air during the collection, processing (including incineration), packaging, or transporting of any asbestos-containing waste material generated by this emissions unit, in accordance with 40 CFR Part 61.150(a).
- 2.c This emissions unit shall be continuously controlled through the application of a fabric filter as specified in 40 CFR Part 61.152.

II. Operational Restrictions

1. The permittee shall properly operate and maintain the fabric filter control device. Bypass devices may be used only during upset or emergency conditions and then only for so long as it takes to shut down the operation generating the particulate asbestos material.
2. In the event of upset or emergency conditions relating to the fabric filter, the permittee shall vent all emissions through a HEPA filter bypass that is certified to be at least 99.97 percent efficient for 0.3 micron particles.
3. All asbestos containing waste material shall be deposited as soon as practical by the permittee at either:
 - a. a waste disposal site operated in accordance with the provisions of 40 CFR Part 61.154; or
 - b. an EPA-approved site that converts regulated asbestos-containing material (RACM) and asbestos containing waste material into non-asbestos material according to the provisions of 40 CFR Part 61.155.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor each potential source of asbestos emissions from any part of this emissions unit, including air cleaning devices, process equipment, and buildings that house equipment for material processing and handling, at least once per day, during the daylight hours, for visible emissions to the outside air during periods of operation. The monitoring shall be by visual observations of at least 15 seconds duration per source of emissions.

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

2. The permittee shall inspect the fabric filter at least once each week for proper operation, for changes that signal the potential for malfunctions, including, to the maximum extent possible without dismantling other than opening the device, the presence of tears, holes, and abrasions in filter bags, and for dust deposits on the clean side of the bags.
3. The permittee shall maintain records of the results of visible emission monitoring and air cleaning device inspections. These records shall include:
 - a. Date and time of each inspection.
 - b. Presence or absence of visible emissions.
 - c. Condition of fabric filters, including the presence of any tears, holes, and abrasions.
 - d. Presence of dust deposits on clean side of fabric filters.
 - e. Brief description of corrective actions taken, including date and time.
 - f. Daily hours of operation for the fabric filter.
4. The permittee shall maintain waste shipment records that include the following information:
 - a. The name, address, and telephone number of the waste generator.
 - b. The name and address of the local, state, or EPA Regional office responsible for administering the asbestos NESHAP program.
 - c. The approximate quantity in cubic meters (or cubic yards).
 - d. The name and telephone number of the disposal site operator.
 - e. The name and physical site location of the disposal site.
 - f. The date transported.
 - g. The name, address, and telephone number of the transporter(s).
 - h. A certification that the contents of this consignment are fully and accurately described by proper shipping name, are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of operation for the emissions unit during which visible emissions occurred and shall include a copy of the visible emission monitoring records which show the deviations for that quarter. These deviation (excursion) reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a copy of the waste shipment record, signed by the owner or operator of the designated waste disposal site, is not received by the waste generator within 45 days of the date the waste was accepted by the initial transporter. This notification shall include:
 - a. A copy of the waste shipment record for which a confirmation of delivery was not received.
 - b. A cover letter signed by the waste generator explaining the efforts taken to locate the asbestos waste shipment and the results of those efforts.

V. Testing Requirements

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

Emissions Limitation -
no visible emissions

Applicable Compliance Method -
Compliance shall be determined by visible emission evaluations performed in accordance with Method 22 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall ensure that vehicles used to transport asbestos-containing waste material are marked during the loading and unloading of waste so that the signs are visible. The markings must conform to the requirements of 40 CFR Part 61.149(d)(1).
2. The permittee shall provide a copy of the waste shipment records, as described in A.III.5., to the disposal site owners or operators at the same time as the asbestos-containing waste material is delivered to the disposal site.
3. For waste shipments where a copy of the waste shipment record, signed by the owner or operator of the designated disposal site, is not received by the waste generator within 35 days of the date the waste was accepted by the initial transporter, the permittee shall contact the transporter and/or the owner or operator of the designated disposal site to determine the status of the waste shipment.
4. The permittee shall be permitted to use alternative fabric filter control devices provided the equipment meets the minimum requirements of 40 CFR Part 61, Subpart M.

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: Asbestos Clean-up (P129)
Activity Description: Asbestos clean-up.

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>
asbestos cleanup, with baghouse control	40 CFR Part 61, Subpart M	See A.I.2.

2. Additional Terms and Conditions

- 2.a The permittee shall discharge no visible emissions to the outside air from any of the operations of from any building or structure in which these manufacturing operations are conducted or from any other associated fugitive sources.
- 2.b There shall be no visible emissions to the outside air during the collection, processing (including incineration), packaging, or transporting of any asbestos-containing waste material generated by this emissions unit, in accordance with 40 CFR Part 61.150(a).
- 2.c This emissions unit shall be continuously controlled through the application of a fabric filter as specified in 40 CFR Part 61.152.

II. Operational Restrictions

1. The permittee shall properly operate and maintain the fabric filter control device. Bypass devices may be used only during upset or emergency conditions and then only for so long as it takes to shut down the operation generating the particulate asbestos material.
2. In the event of upset or emergency conditions relating to the fabric filter, the permittee shall vent all emissions through a HEPA filter bypass that is certified to be at least 99.97 percent efficient for 0.3 micron particles.
3. All asbestos containing waste material shall be deposited as soon as practical by the permittee at either:
 - a. a waste disposal site operated in accordance with the provisions of 40 CFR Part 61.154; or
 - b. an EPA-approved site that converts regulated asbestos-containing material (RACM) and asbestos containing waste material into non-asbestos material according to the provisions of 40 CFR Part 61.155.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor each potential source of asbestos emissions from any part of this emissions unit, including air cleaning devices, process equipment, and buildings that house equipment for material processing and handling, at least once per day, during the daylight hours, for visible emissions to the outside air during periods of operation. The monitoring shall be by visual observations of at least 15 seconds duration per source of emissions.

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

2. The permittee shall inspect the fabric filter at least once each week for proper operation, for changes that signal the potential for malfunctions, including, to the maximum extent possible without dismantling other than opening the device, the presence of tears, holes, and abrasions in filter bags, and for dust deposits on the clean side of the bags.
3. The permittee shall maintain records of the results of visible emission monitoring and air cleaning device inspections. These records shall include:
 - a. Date and time of each inspection.
 - b. Presence or absence of visible emissions.
 - c. Condition of fabric filters, including the presence of any tears, holes, and abrasions.
 - d. Presence of dust deposits on clean side of fabric filters.
 - e. Brief description of corrective actions taken, including date and time.
 - f. Daily hours of operation for the fabric filter.
4. The permittee shall maintain waste shipment records that include the following information:
 - a. The name, address, and telephone number of the waste generator.
 - b. The name and address of the local, state, or EPA Regional office responsible for administering the asbestos NESHAP program.
 - c. The approximate quantity in cubic meters (or cubic yards).
 - d. The name and telephone number of the disposal site operator.
 - e. The name and physical site location of the disposal site.
 - f. The date transported.
 - g. The name, address, and telephone number of the transporter(s).
 - h. A certification that the contents of this consignment are fully and accurately described by proper shipping name, are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of operation for the emissions unit during which visible emissions occurred and shall include a copy of the visible emission monitoring records which show the deviations for that quarter. These deviation (excursion) reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a copy of the waste shipment record, signed by the owner or operator of the designated waste disposal site, is not received by the waste generator within 45 days of the date the waste was accepted by the initial transporter. This notification shall include:
 - a. A copy of the waste shipment record for which a confirmation of delivery was not received.
 - b. A cover letter signed by the waste generator explaining the efforts taken to locate the asbestos waste shipment and the results of those efforts.

V. Testing Requirements

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

Emissions Limitation -
no visible emissions

Applicable Compliance Method -
Compliance shall be determined by visible emission evaluations performed in accordance with Method 22 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The permittee shall ensure that vehicles used to transport asbestos-containing waste material are marked during the loading and unloading of waste so that the signs are visible. The markings must conform to the requirements of 40 CFR Part 61.149(d)(1).
2. The permittee shall provide a copy of the waste shipment records, as described in A.III.5., to the disposal site owners or operators at the same time as the asbestos-containing waste material is delivered to the disposal site.
3. For waste shipments where a copy of the waste shipment record, signed by the owner or operator of the designated disposal site, is not received by the waste generator within 35 days of the date the waste was accepted by the initial transporter, the permittee shall contact the transporter and/or the owner or operator of the designated disposal site to determine the status of the waste shipment.
4. The permittee shall be permitted to use alternative fabric filter control devices provided the equipment meets the minimum requirements of 40 CFR Part 61, Subpart M.

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: Rollcoater & Oven #7 (P143)
Activity Description: Rollcoating and baking.

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>
rollcoater # 7; coating of metal parts with adhesive	OAC rule 3745-31-05 PTI 08-2352	See A.I.2.a.
	OAC rule 3745-21-09(U)(2)(e)(i)	less than or equal to 8 gallons/day of coating usage

2. Additional Terms and Conditions

- 2.a The monthly volatile organic compound (VOC) emission rate for the seven rollcoater operations (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 3.31 tons, including cleanup.

II. Operational Restrictions

1. The daily coating usage for this emissions unit shall not exceed 8 gallons.
2. The annual coating usage for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 10,200 gallons.
3. The annual cleanup material usage for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 2,400 gallons.
4. The VOC content of each adhesive coating employed in this emissions unit shall not exceed 6.0 pounds VOC per gallon of coating, as applied.
5. The VOC content of each cleanup material employed in this emissions unit shall not exceed 7.6 pounds per gallon.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - a. The name and identification number of each coating employed.
 - b. The volume, in gallons, of each coating employed.
 - c. The total volume, in gallons, of all coatings employed.
 - d. The VOC content of each coating, as applied, in pounds per gallon.
 - e. The VOC content of each cleanup material employed, in pounds per gallon.
2. The permittee shall collect and record the following information each month for the seven rollcoaters (P064, P065, P066, P098, P099, P111 and P143) combined:
 - a. The name and identification of each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The VOC content of each coating and cleanup material, in pounds per gallon.
 - d. The total volume, in gallons, of all coatings employed.
 - e. The total volume, in gallons, of all cleanup materials employed.
 - f. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that this emissions unit employed more than the applicable daily coating usage restriction. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit annual reports which summarize the following:
 - a. the actual total coating usage, in gallons/year, for emissions units P064, P065, P066, P098, P099, P111 and P143 combined; and
 - b. the actual total cleanup material usage, in gallons/year, for emissions units P064, P065, P066, P098, P099, P111 and P143 combined.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. In accordance with paragraph A.1.c of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which identify each month during which the total VOC emission rate from all coatings and cleanup materials for the combined emissions units exceeded 3.31 tons per month, and the total VOC emissions for each such month.
4. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any record showing the use of any noncomplying coating or cleanup material, as specified in section A.II.4 and 5 of this permit for VOC content. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days following the end of the month.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitation-
less than or equal to 8 gallons/day of coating usage

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.1.

- 1.b** Emission Limitation-
3.31 tons/month VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.2.

- 1.c** Emission Limitation:
6.0 pounds VOC/gallon -coatings
7.6 pounds VOC/gallon- cleanup materials

Applicable Compliance Method:
Compliance shall be based on the record keeping specified in section A.III.1. of this permit.

USEPA Method 24 shall be used to determine the VOC contents for the 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 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.

- 1.d** Emission Limitation:
10,200 gallons/year - coatings (combined)
2,400 gallon/year - cleanup materials (combined)

Applicable Compliance Method:

Compliance with the above gallon usage restrictions shall be based upon the record keeping requirements, as specified in section A.III.2 of this permit and shall be the sum of the monthly coating and cleanup material usages for the previous calendar year.

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>
rollcoater # 7; coating of metal parts with adhesive	OAC 3745-31-05 PTI 08-2352	See B.I.2.a.

2. Additional Terms and Conditions

- 2.a The maximum annual volatile organic compound (VOC) emissions rate for the seven rollcoater operations (P064, P065, P066, P098, P099, P111 and P143) combined shall not exceed 39.72 tons/yr, including cleanup.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. See A.III.

IV. Reporting Requirements

1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit and the 6 other rollcoaters identified above for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

Emission Limitation-
39.72 tons/yr VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping specified in A.III.2. and shall be the sum of the monthly VOC emission rates for the calendar year.

VI. Miscellaneous Requirements

None

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