State of Ohio Environmental Protection Agency

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

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

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

12/30/99

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

01-25-04-1529
Evans Columbus, Inc.
Mr. Tracy S. Bugg
1385 Blatt Boulevard
Gahanna Industrial Park
Blacklick, OH 43004-9523

Dear Tracy S. Bugg:

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 Central District Office 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 Central District Office.

Very truly yours,

Thomas G. Rigo

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

cc: USEPA (electronic)
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
Central District Office

Ohio EPA
State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 12/30/99

Effective Date:

Expiration Date:

The duration of this permit will be five years.

This document constitutes issuance to:

Evans Columbus, Inc.
1410 Blatt Boulevard
Gahanna Industrial Park
Blacklick, OH 43004-9766

of a Title V permit for Facility ID: 01-25-04-1529

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:
B001 (Air Makeup Heater)
10 million BTU/hr natural gas burning unit (formerly submitted/reported as Z002).

K001 (Drum Lining Line)
Coating of interior of 55-gallon drums

K002 (Exterior Coating Line)
Coating of exterior of 55-gallon drums

K003 (Lid and Bottom Coating Line)
Coating of 55-gallon drum lids and drum bottoms

P003 (Paint Room)
Paint room used to mix and pump paint to coating lines (formerly submitted/reported as Z015).

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:

Central District Office
3232 Alum Creek Drive
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

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 of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
   ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be 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.6 below if no deviations occurred during the quarter.
   iii. Written reports, which identify any deviations from the federally enforceable <u>monitoring</u>, <u>recordkeeping</u>, <u>and reporting requirements</u> 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 applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"); and, pursuant to 40 CFR 68.215(a), the permittee shall submit either of the following:

a. a compliance plan for meeting the requirements of 40 CFR Part 68 by the date specified in 40 CFR 68.10(a) and OAC 3745-104-05(A); or

b. as part of the compliance certification submitted under 40 CFR 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 CFR Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management 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 and to the Administrator of U.S. EPA in the following manner in the following manner and with the following content:

   i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
   ii. Compliance certifications shall include the following:

      (a) An identification of each term or condition of this permit that is the basis of the certification.
      (b) The permittee's current compliance status.
      (c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

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

15. Emergencies

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

16. Off Permit Changes

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

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;

b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such

change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

17. Compliance Method Requirements

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

18. Title VI Provisions

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

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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 of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. 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).

4. 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.

5. 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.

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

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

Shell Washer and Drying Oven (P001); Lid Washer and Drying Oven (P002); Stencil/Silkscreen Area (Z010); Video Ink Jet Stamping (Z011); Lid and Bottom Seam Sealant (Z012); Drum Touch-up (Z014)

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Air Makeup Heater (B001)

Activity Description: 10 million BTU/hr natural gas burning unit (formerly submitted/reported as Z002).

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
10.0 mmBtu/hr natural gas fired indoor ambient air space heater	OAC rule 3745-17-10 (B)(1)	None, see A.I.2.a below
	OAC rule 3745-17-07 (A)	None, see A.I.2.c below
	OAC rule 3745-17-11(B)(1)	None, see A.I.2.b below.
	OAC rule 3745-18-06	None, exempt pursuant to OAC rule 3745-18-06(B).

2. Additional Terms and Conditions

2.a OAC rule 3745-17-10 applies to fuel burning equipment that produce heat by indirect heat transfer. The rule does not apply to this emissions unit since the products of combustion are directly transferred to the indoor air.

2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

2.c This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11 or OAC rule 3745-17-10.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
10.0 mmBtu/hr natural gas fired indoor ambient air space heater	OAC rule 3745-31-05 (A)(3) (PTI # 01-6389)	0.14 lb PE/hr, 0.61 ton PE/yr; 1.4 lbs nitrogen oxides (NOx)/hr, 6.13 tons NOx/yr; 0.35 lb carbon monoxide (CO)/hr, 1.53 tons CO/yr; 0.01 lb sulfur dioxide (SO2)/hr, 0.03 ton SO2/yr; 0.06 lb organic compounds (OC)/hr, 0.25 ton OC/yr

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

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitation:
0.14 lb PE/hr, 0.61 ton PE/yr

Applicable Compliance Method:
Compliance with the emission limitation of 0.14 lb PE/hr shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,000 cu. ft./hr) by the AP-42, Table 1.4-3 emission factor for natural gas of 1.9 lbs PE/mmscf. The annual PE emissions limitation of 0.61 ton is the potential to emit and is based on the allowable hourly emission rate multiplied by 8760 hours/year.

If required, the permittee shall demonstrate compliance with the above hourly particulate emission limitation in accordance with the procedures and methods specified in OAC 3745-17-03(B)(10).

V. Testing Requirements (continued)

1.b Emission Limitation:
1.4 lbs NOx/hr, 6.13 tons NOx/yr

Applicable Compliance Method:
Compliance with the emission limitation of 1.4 lbs NOx/hr shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,000 cu. ft./hr) by the AP-42, Table 1.4-1 emission factor for natural gas of 140 lbs NOx/mmscf. The annual NOx emission limitation of 6.13 tons is the potential to emit and is based on the allowable hourly emission rate multiplied by 8760 hours/year.

If required, the permittee shall demonstrate compliance with the above hourly NOx emission limitation using Method 7 located in 40 CFR Part 60, Appendix A.

1.c Emission Limitation:
0.35 lb CO/hr, 1.53 tons CO/yr

Applicable Compliance Method:
Compliance with the emission limitation of 0.35 lb CO/hr shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,000 cu. ft./hr) by the AP-42, Table 1.4-1 emission factor for natural gas of 35 lbs CO/mmscf. The annual CO emission limitation of 1.53 tons is the potential to emit and is based on the allowable hourly emission rate multiplied by 8760 hours/year.

If required, the permittee shall demonstrate compliance with the above hourly CO emission limitation using Method 10 located in 40 CFR Part 60, Appendix A.

1.d Emission Limitation:
0.01 lb SO2/hr, 0.03 ton SO2/yr

Applicable Compliance Method:
Compliance with the emission limitation of 0.01 lb SO2/hr shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,000 cu. ft./hr) by the AP-42, Table 1.4-1 emission factor for natural gas of 0.6 lb SO2/mmscf. The annual SO2 emission limitation of 0.03 ton is the potential to emit and is based on the allowable hourly emission rate multiplied by 8760 hours/year.

If required, the permittee shall demonstrate compliance with the above hourly SO2 emission limitation using Method 19 located in 40 CFR Part 60, Appendix A.

1.e Emission Limitation:
0.06 lb OC/hr, 0.25 ton OC/yr

Applicable Compliance Method:
Compliance with the emission limitation of 0.06 lb OC/hr shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,000 cu. ft./hr) by the AP-42, Table 1.4-1 emission factor for natural gas of 5.8 lbs OC/mmscf. The annual OC emission limitation of 0.25 ton is the potential to emit and is based on the allowable hourly emission rate multiplied by 8760 hours/year.

If required, the permittee shall demonstrate compliance with the above hourly OC emission limitation using Method 25 or 25A located in 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Drum Lining Line (K001)

Activity Description: Coating of interior of 55-gallon drums

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
interior drum lining line (two drum lining spray booths and one 4.8 mmBtu/hr baking oven)	OAC rule 3475-21-09 (U)(1)(e)	4.3 pounds volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11(B)(1)	6.98 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07 (A)(1)	20 percent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-31-05 (A)(3) PTI # 01-6362	combined emissions from K001-K003 shall not exceed 100.71 tons VOC/yr

2. Additional Terms and Conditions

2.a The maximum annual coating usage for this emissions unit shall not exceed 15,670 gallons per year, based upon a rolling, 12-month summation of the monthly production rates.

To ensure enforceability during the first twelve calendar months of operation following the issuance of the permit to install, the permittee shall not exceed the production levels specified in the following table:

Month	Maximum coating usage (gallons)
1-1	1,632
1-2	3,265
1-3	4,897
1-4	6,529
1-5	7,835
1-6	9,141
1-7	10,447
1-8	11,753
1-9	12,732
1-10	13,711
1-11	14,691
1-12	15,670

After the first twelve calendar months of operation following the issuance of the permit to install, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

II. Operational Restrictions

1. Each coating employed in this emissions unit shall comply with the VOC content specified in section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

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

III. Monitoring and/or Record Keeping Requirements

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

a. the name and identification number of each coating employed;

b. the VOC content of each coating, in pounds/gallon and in pounds/gallon excluding water and exempt solvents;

c. the number of gallons of each coating employed;

d. the total number of gallons of all coatings employed; and

e. the total emissions of VOC from all coatings employed, in pounds.

2. The permittee shall record the following information each month for this emissions unit:

a. the name and identification number of each cleanup material employed;

b. the VOC content of each cleanup material, in pounds/gallon;

c. the number of gallons of each cleanup material employed; and

d. the total emissions of VOC from all cleanup materials employed, in pounds.

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

3. The permittee shall calculate and record the total VOC emissions each year (the annual VOC emissions shall be calculated by summing the monthly VOC emissions from sections A.III.1.e and A.III.2.d for the calendar year), in tons, for this emissions unit.

4. The permittee shall calculate and record the total VOC emissions each year for K001, K002 and K003 (the annual VOC emissions shall be calculated by summing the individual VOC emissions from each emissions unit), in tons.

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

a. during the first 12 calendar months of operation following the issuance of the permit to install, the cumulative coating usage for each calendar month;

b. beginning after the first 12 calendar months of operation following the issuance of the permit to install, the rolling, 12-month summation of the coating usage rates.

6. The permittee shall maintain daily records that document any time periods when the filtration system was not in service when the emissions unit was in operation.

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 showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. 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 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.

3. The permittee shall submit annual reports that summarize the actual annual VOC emissions for emissions units K001, K002 and K003. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

4. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the following:

a. the cumulative coating usage restriction for each calendar month, during the first 12 calendar months of operation following the issuance of the permit to install;

b. the rolling, 12-month summation of the coating usage limitation, beginning after the first 12 calendar months of operation following the issuance of the permit to install.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

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

1.a Emission Limitation: 4.3 pounds VOC/gallon of coating (excluding water and exempt solvents)

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

V. Testing Requirements (continued)

1.b Emission Limitation:
6.98 lb/hr particulate emissions (PE)

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

E = particulate emissions rate (lbs/hr)

= maximum coating solids usage rate in pounds per hour of
34.9 lbs/hr X (1-TE) X (1-CE)

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 (60% according to 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

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

Applicable Compliance Method: OAC rule 3745-17-03(B)(1)

1.d Emission Limitation:
combined emissions from K001-K003 shall not exceed 100.71 tons VOC/yr

Compliance shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

1.e Emission Limitation:
coating usage for this emissions unit shall not exceed 15,670 gallons per year.

Compliance shall be based upon the record keeping requirements specified in sections A.III.1 and A.III.5 of this permit.

2. USEPA Method 24 shall be used to determine the VOC contents of the coatings.

3. USEPA Method 24 or formulation data shall be used to determine the VOC contents of the 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
interior drum lining line (two drum lining spray booths and one 4.8 mmBtu/hr baking oven)	OAC rule 3745-31-05 (A)(3) (PTI #01-6362)	64.5 lbs VOC/hr from coatings only, 34.12 tons VOC/year including emissions from cleanup materials; combined emissions from K001-K003 shall not exceed 2.0 tons PE/yr. see B.2.a-B.2.c

2. Additional Terms and Conditions

2.a Any use of n-butyl acetate to reduce the viscosity of interior lining coating materials shall not exceed 33 gallons per month.

2.b Annual emissions of n-butyl alcohol, n-butyl acetate, formaldehyde, and phenol shall not exceed 6.85 tons per year, 1.46 tons per year, 0.99 tons per year, and 1.45 tons per year, respectively.

2.c Annual emissions of the following air toxic compounds shall not exceed the 1.0 ton per year threshold for air toxics modeling: iron (III) oxide, silica (crystalline), titanium dioxide, talc (non-asbestos), quartz, phosphoric acid, and barium sulfate.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record each month for this emissions unit the number of gallons of n-butyl acetate employed.

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly gallons usage limitation for n-butyl acetate. The reports shall be submitted in accordance with section B.2 of the General Terms and Conditions of this permit.

2. The permittee shall submit annual reports which specify the total VOC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitation:
64.5 lbs VOC/hr

Applicable Compliance Method: Compliance with the maximum hourly VOC emission limitation (potential to emit) shall be determined as follows:

Multiply the maximum coating usage rate (15 gallons/hr) by the maximum VOC content of all the coatings employed (in lbs VOC/gallon of coating).

1.b Emission Limitation:
34.12 tons VOC/year

Compliance shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

1.c Emission Limitation:
combined emissions from K001-K003 shall not exceed 2.0 tons PE/yr

Applicable Compliance Method:
Compliance shall be demonstrated by summing the annual PE for each coating booth, K001, K002 and K003. To determine the annual particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

E = particulate emissions rate (tons/yr)

= maximum coating solids usage rate in tons per year (calculated by multiplying the annual coating usage recorded in A.III.5 of this permit by the coating density and then by the weight % solids of the coating) X (1-TE) X (1-CE)

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 (60% according to 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

1.d Emission Limitation:
use of n-butyl acetate to reduce the viscosity of interior lining coating materials shall not exceed 33 gallons per month

Compliance shall be based upon the record keeping requirements specified in section B.III.1 of this permit.

V. Testing Requirements (continued)

1.e Emission Limitation:
Annual emissions of n-butyl alcohol, n-butyl acetate, formaldehyde, and phenol shall not exceed 6.85 tons per year, 1.46 tons per year, 0.99 ton per year, and 1.45 tons per year, respectively; and

annual emissions of the following air toxic compounds shall not exceed the 1.0 ton per year threshold for air toxics modeling: iron (III) oxide, silica (crystalline), titanium dioxide, talc (non-asbestos), quartz, phosphoric acid, and barium sulfate.

Applicable Compliance Method:
The tons per year limitations for the various air toxics were established using the gallons per year restriction for K001, K002 and K003 and the coatings with the highest toxic content used at the facility. Therefore, compliance with the tons per year air toxic limitations will be assumed as long as compliance with the annual gallons restriction is maintained.

VI. Miscellaneous Requirements

1. Toxics Policy Requirement

This permit allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 3.50
Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3): 393.49
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 8.30
Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3): 931.25
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4,880.95

Pollutant: Phenol

TLV (mg/m3): 19
Maximum Hourly Emission Rate (lbs/hr): 3.62
Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3): 406.60
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 452.38

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 21.84
Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3): 2,516.05
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 14,047.62

VI. Miscellaneous Requirements (continued)

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

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

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Exterior Coating Line (K002)

Activity Description: Coating of exterior of 55-gallon drums

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
exterior surface coating line (one water wash paint booth and one 3.15 mmBtu/hr baking oven	OAC rule 3475-21-09 (U)(1)(f)	3.5 pounds volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11(B)(1)	3.45 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07 (A)(1)	20 percent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-31-05 (A)(3) PTI # 01-6362	combined emissions from K001-K003 shall not exceed 100.71 tons VOC/yr

2. Additional Terms and Conditions

2.a The maximum annual coating usage for this emissions unit shall not exceed 29,900 gallons per year, based upon a rolling, 12-month summation of the monthly production rates.

To ensure enforceability during the first twelve calendar months of operation following the issuance of the permit to install, the permittee shall not exceed the production levels specified in the following table:

Month	Maximum coating usage (gallons)
1-1	3,115
1-2	6,229
1-3	9,344
1-4	12,458
1-5	14,950
1-6	17,442
1-7	19,933
1-8	22,425
1-9	24,294
1-10	26,163
1-11	28,031
1-12	29,900

After the first twelve calendar months of operation following the issuance of the permit to install, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

II. Operational Restrictions

1. Each coating employed in this emissions unit shall comply with the VOC content specified in section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

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

III. Monitoring and/or Record Keeping Requirements

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

a. the name and identification number of each coating employed;

b. the VOC content of each coating, in pounds/gallon and in pounds/gallon excluding water and exempt solvents;

c. the number of gallons of each coating employed;

d. the total number of gallons of all coatings employed; and

e. the total emissions of VOC from all coatings employed, in pounds.

2. The permittee shall record the following information each month for this emissions unit:

a. the name and identification number of each cleanup material employed;

b. the VOC content of each cleanup material, in pounds/gallon;

c. the number of gallons of each cleanup material employed; and

d. the total emissions of VOC from all cleanup materials employed, in pounds.

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

3. The permittee shall calculate and record the total VOC emissions each year (the annual VOC emissions shall be calculated by summing the monthly VOC emissions from sections A.III.1.e and A.III.2.d for the calendar year), in tons, for this emissions unit.

4. The permittee shall calculate and record the total VOC emissions each year for K001, K002 and K003 (the annual VOC emissions shall be calculated by summing the individual VOC emissions from each emissions unit), in tons.

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

a. during the first 12 calendar months of operation following the issuance of the permit to install, the cumulative coating usage for each calendar month;

b. beginning after the first 12 calendar months of operation following the issuance of the permit to install, the rolling, 12-month summation of the coating usage rates.

6. The permittee shall maintain daily records that document any time periods when the filtration system was not in service when the emissions unit was in operation.

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 showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. 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 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.

3. The permittee shall submit annual reports that summarize the actual annual VOC emissions for emissions units K001, K002 and K003. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

4. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the following:

a. the cumulative coating usage restriction for each calendar month, during the first 12 calendar months of operation following the issuance of the permit to install;

b. the rolling, 12-month summation of the coating usage limitation, beginning after the first 12 calendar months of operation following the issuance of the permit to install.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

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

1.a Emission Limitation: 3.5 pounds VOC/gallon of coating (excluding water and exempt solvents)

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

V. Testing Requirements (continued)

1.b Emission Limitation:
3.45 lb/hr particulate emissions (PE)

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

E = particulate emissions rate (lbs/hr)

= maximum coating solids usage rate in pounds per hour of
34.9 lbs/hr X (1-TE) X (1-CE)

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 (60% according to 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

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

Applicable Compliance Method: OAC rule 3745-17-03(B)(1)

1.d Emission Limitation:
combined emissions from K001-K003 shall not exceed 100.71 tons VOC/yr

Compliance shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

1.e Emission Limitation:
coating usage for this emissions unit shall not exceed 29,900 gallons per year.

Compliance shall be based upon the record keeping requirements specified in sections A.III.1 and A.III.5 of this permit.

2. USEPA Method 24 shall be used to determine the VOC contents of the coatings.

3. USEPA Method 24 or formulation data shall be used to determine the VOC contents of the 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
exterior surface coating line (one water wash paint booth and one 3.15 mmBtu/hr baking oven	OAC rule 3745-31-05 (A)(3) (PTI #01-6362)	24.5 lbs VOC/hr from coatings only, 52.33 tons VOC/year including emissions from cleanup materials; combined emissions from K001-K003 shall not exceed 2.0 tons PE/yr. see B.2.a-B.2.c

2. Additional Terms and Conditions

2.a Any use of n-butyl acetate to reduce the viscosity of interior lining coating materials shall not exceed 33 gallons per month.

2.b Annual emissions of n-butyl alcohol, n-butyl acetate, formaldehyde, and phenol shall not exceed 6.85 tons per year, 1.46 tons per year, 0.99 tons per year, and 1.45 tons per year, respectively.

2.c Annual emissions of the following air toxic compounds shall not exceed the 1.0 ton per year threshold for air toxics modeling: iron (III) oxide, silica (crystalline), titanium dioxide, talc (non-asbestos), quartz, phosphoric acid, and barium sulfate.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record each month for this emissions unit the number of gallons of n-butyl acetate employed.

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly gallons usage limitation for n-butyl acetate. The reports shall be submitted in accordance with section B.2 of the General Terms and Conditions of this permit.

2. The permittee shall submit annual reports which specify the total VOC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitation:
24.5 lbs VOC/hr

Applicable Compliance Method: Compliance with the maximum hourly VOC emission limitation (potential to emit) shall be determined as follows:

Multiply the maximum coating usage rate (7 gallons/hr) by the maximum VOC content of all the coatings employed (in lbs VOC/gallon of coating).

1.b Emission Limitation:
52.33 tons VOC/year

Compliance shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

1.c Emission Limitation:
combined emissions from K001-K003 shall not exceed 2.0 tons PE/yr

Applicable Compliance Method:
Compliance shall be demonstrated by summing the annual PE for each coating booth, K001, K002 and K003. To determine the annual particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

E = particulate emissions rate (tons/yr)

= maximum coating solids usage rate in tons per year (calculated by multiplying the annual coating usage recorded in A.III.5 of this permit by the coating density and then by the weight % solids of the coating) X (1-TE) X (1-CE)

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 (60% according to 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

1.d Emission Limitation:
use of n-butyl acetate to reduce the viscosity of interior lining coating materials shall not exceed 33 gallons per month

Compliance shall be based upon the record keeping requirements specified in section B.III.1 of this permit.

V. Testing Requirements (continued)

1.e Emission Limitation:
Annual emissions of n-butyl alcohol, n-butyl acetate, formaldehyde, and phenol shall not exceed 6.85 tons per year, 1.46 tons per year, 0.99 ton per year, and 1.45 tons per year, respectively; and

annual emissions of the following air toxic compounds shall not exceed the 1.0 ton per year threshold for air toxics modeling: iron (III) oxide, silica (crystalline), titanium dioxide, talc (non-asbestos), quartz, phosphoric acid, and barium sulfate.

Applicable Compliance Method:
The tons per year limitations for the various air toxics were established using the gallons per year restriction for K001, K002 and K003 and the coatings with the highest toxic content used at the facility. Therefore, compliance with the tons per year air toxic limitations will be assumed as long as compliance with the annual gallons restriction is maintained.

VI. Miscellaneous Requirements

1. Toxics Policy Requirement

This permit allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 3.50
Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3): 393.49
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

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

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

VI. Miscellaneous Requirements (continued)

3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Lid and Bottom Coating Line (K003)

Activity Description: Coating of 55-gallon drum lids and drum bottoms

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
lid coating line (one paint booth, one lining booth and one 3.15 mmBtu/hr baking oven	OAC rule 3475-21-09 (U)(1)(e)	4.3 pounds volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
	OAC rule 3745-17-11(B)(1)	2.96 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07 (A)(1)	20 percent opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-31-05 (A)(3) PTI # 01-6362	combined emissions from K001-K003 shall not exceed 100.71 tons VOC/yr

2. Additional Terms and Conditions

2.a The maximum annual coating usage for this emissions unit shall not exceed 6,548 gallons per year, based upon a rolling, 12-month summation of the monthly production rates.

To ensure enforceability during the first twelve calendar months of operation following the issuance of the permit to install, the permittee shall not exceed the production levels specified in the following table:

Month	Maximum coating usage (gallons)
1-1	682
1-2	1,364
1-3	2,046
1-4	2,728
1-5	3,274
1-6	3,820
1-7	4,365
1-8	4,911
1-9	5,320
1-10	5,730
1-11	6,319
1-12	6,548

After the first twelve calendar months of operation following the issuance of the permit to install, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

II. Operational Restrictions

1. Each coating employed in this emissions unit shall comply with the VOC content specified in section A.I.1 of the terms and conditions of this permit on an "as applied" basis.

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

III. Monitoring and/or Record Keeping Requirements

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

a. the name and identification number of each coating employed;

b. the VOC content of each coating, in pounds/gallon and in pounds/gallon excluding water and exempt solvents;

c. the number of gallons of each coating employed;

d. the total number of gallons of all coatings employed; and

e. the total emissions of VOC from all coatings employed, in pounds.

2. The permittee shall record the following information each month for this emissions unit:

a. the name and identification number of each cleanup material employed;

b. the VOC content of each cleanup material, in pounds/gallon;

c. the number of gallons of each cleanup material employed; and

d. the total emissions of VOC from all cleanup materials employed, in pounds.

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

3. The permittee shall calculate and record the total VOC emissions each year (the annual VOC emissions shall be calculated by summing the monthly VOC emissions from sections A.III.1.e and A.III.2.d for the calendar year), in tons, for this emissions unit.

4. The permittee shall calculate and record the total VOC emissions each year for K001, K002 and K003 (the annual VOC emissions shall be calculated by summing the individual VOC emissions from each emissions unit), in tons.

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

a. during the first 12 calendar months of operation following the issuance of the permit to install, the cumulative coating usage for each calendar month;

b. beginning after the first 12 calendar months of operation following the issuance of the permit to install, the rolling, 12-month summation of the coating usage rates.

6. The permittee shall maintain daily records that document any time periods when the filtration system was not in service when the emissions unit was in operation.

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 showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. 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 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.

3. The permittee shall submit annual reports that summarize the actual annual VOC emissions for emissions units K001, K002 and K003. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

4. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the following:

a. the cumulative coating usage restriction for each calendar month, during the first 12 calendar months of operation following the issuance of the permit to install;

b. the rolling, 12-month summation of the coating usage limitation, beginning after the first 12 calendar months of operation following the issuance of the permit to install.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

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

1.a Emission Limitation: 4.3 pounds VOC/gallon of coating (excluding water and exempt solvents)

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

V. Testing Requirements (continued)

1.b Emission Limitation:
2.96 lb/hr particulate emissions (PE)

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

E = particulate emissions rate (lbs/hr)

= maximum coating solids usage rate in pounds per hour of
34.9 lbs/hr X (1-TE) X (1-CE)

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 (60% according to 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

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

Applicable Compliance Method: OAC rule 3745-17-03(B)(1)

1.d Emission Limitation:
combined emissions from K001-K003 shall not exceed 100.71 tons VOC/yr

Compliance shall be based upon the record keeping requirements specified in section A.III.4 of this permit.

1.e Emission Limitation:
coating usage for this emissions unit shall not exceed 6,548 gallons per year.

Compliance shall be based upon the record keeping requirements specified in sections A.III.1 and A.III.5 of this permit.

2. USEPA Method 24 shall be used to determine the VOC contents of the coatings.

3. USEPA Method 24 or formulation data shall be used to determine the VOC contents of the 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
lid coating line (one paint booth, one lining booth and one 3.15 mmBtu/hr baking oven	OAC rule 3745-31-05 (A)(3) (PTI #01-6362)	25.8 lbs VOC/hr from coatings only, 14.26 tons VOC/year including emissions from cleanup materials; combined emissions from K001-K003 shall not exceed 2.0 tons PE/yr. see B.2.a-B.2.c

2. Additional Terms and Conditions

2.a Any use of n-butyl acetate to reduce the viscosity of interior lining coating materials shall not exceed 33 gallons per month.

2.b Annual emissions of n-butyl alcohol, n-butyl acetate, formaldehyde, and phenol shall not exceed 6.85 tons per year, 1.46 tons per year, 0.99 tons per year, and 1.45 tons per year, respectively.

2.c Annual emissions of the following air toxic compounds shall not exceed the 1.0 ton per year threshold for air toxics modeling: iron (III) oxide, silica (crystalline), titanium dioxide, talc (non-asbestos), quartz, phosphoric acid, and barium sulfate.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record each month for this emissions unit the number of gallons of n-butyl acetate employed.

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly gallons usage limitation for n-butyl acetate. The reports shall be submitted in accordance with section B.2 of the General Terms and Conditions of this permit.

2. The permittee shall submit annual reports which specify the total VOC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitation:
25.8 lbs VOC/hr

Applicable Compliance Method: Compliance with the maximum hourly VOC emission limitation (potential to emit) shall be determined as follows:

Multiply the maximum coating usage rate (6 gallons/hr) by the maximum VOC content of all the coatings employed (in lbs VOC/gallon of coating).

1.b Emission Limitation:
14.26 tons VOC/year

Compliance shall be based upon the record keeping requirements specified in section A.III.3 of this permit.

1.c Emission Limitation:
combined emissions from K001-K003 shall not exceed 2.0 tons PE/yr

Applicable Compliance Method:
Compliance shall be demonstrated by summing the annual PE for each coating booth, K001, K002 and K003. To determine the annual particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

E = particulate emissions rate (tons/yr)

= maximum coating solids usage rate in tons per year (calculated by multiplying the annual coating usage recorded in A.III.5 of this permit by the coating density and then by the weight % solids of the coating) X (1-TE) X (1-CE)

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 (60% according to 40 CFR 60.453)

CE = control efficiency of the control equipment (assumed to be 90%)

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03(B)(10).

1.d Emission Limitation:
use of n-butyl acetate to reduce the viscosity of interior lining coating materials shall not exceed 33 gallons per month

Compliance shall be based upon the record keeping requirements specified in section B.III.1 of this permit.

V. Testing Requirements (continued)

1.e Emission Limitation:
Annual emissions of n-butyl alcohol, n-butyl acetate, formaldehyde, and phenol shall not exceed 6.85 tons per year, 1.46 tons per year, 0.99 ton per year, and 1.45 tons per year, respectively; and

annual emissions of the following air toxic compounds shall not exceed the 1.0 ton per year threshold for air toxics modeling: iron (III) oxide, silica (crystalline), titanium dioxide, talc (non-asbestos), quartz, phosphoric acid, and barium sulfate.

Applicable Compliance Method:
The tons per year limitations for the various air toxics were established using the gallons per year restriction for K001, K002 and K003 and the coatings with the highest toxic content used at the facility. Therefore, compliance with the tons per year air toxic limitations will be assumed as long as compliance with the annual gallons restriction is maintained.

VI. Miscellaneous Requirements

1. Toxics Policy Requirement

This permit allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 3.50
Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3): 393.49
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Pollutant: Methyl Isobutyl Ketone

TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 8.30
Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3): 931.25
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4,880.95

Pollutant: Phenol

TLV (mg/m3): 19
Maximum Hourly Emission Rate (lbs/hr): 3.62
Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3): 406.60
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 452.38

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 21.84
Predicted 1-Hour Maximum Ground Level Concentration at the Fence Line (ug/m3): 2,516.05
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 14,047.62

VI. Miscellaneous Requirements (continued)

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

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

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Room (P003)

Activity Description: Paint room used to mix and pump paint to coating lines (formerly submitted/reported as Z015).

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mix and pumping room	OAC rule 3745-21-07 (G)(2)	8 lbs organic compounds (OC)/hr, 40 lbs OC/day

2. Additional Terms and Conditions

2.a The potential to emit of organic compounds is less than 8 pounds per hour. Therefore, no record keeping or reporting requirements are required to show compliance with the hourly emission limitation.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the mixing operation:

a. the number of mixing units in operation during the day;

b. the number of hours each individual mixing unit was in operation (a mixing unit is in operation if any mixing is being performed in the unit);

c. the total number of hours of operation for all mixing units; and

d. the total daily OC emissions from all mixing units (total from c. times a company-supplied emission factor of 0.22 lb OC/hr of mixing operation, calculated by weighing drums before and after an hour of mixing was performed).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the organic compound emissions from this emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:
8 lbs OC/hr

Applicable Compliance Method: Compliance with the hourly OC emission limitation shall be determined as follows:

Multiply the maximum number of mixing units operated in a hour (9 units) by the maximum OC emissions from mixing (0.22 lb OC/hour of mixing).

1.b Emission Limitations: 40 lbs OC/day

Applicable compliance method: The record keeping requirements in Section A.III.1 of this permit shall be used to determine compliance with the above limitation.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mix and pumping room	OAC rule 3745-31-05 (A)(3) PTI # 01-6389	1.98 lbs OC/hr, 19.8 lbs OC/day, 3.1 tons OC/yr, (see B.2.a-B.2.c and B.II.1 below)

2. Additional Terms and Conditions

2.a The maximum annual gallons of coatings mixed in this emissions unit shall not exceed 51,721 gallons.

2.b The maximum daily operating hours for this emissions unit shall not exceed 10 hours.

2.c The maximum annual operating hours for this emissions unit shall not exceed 3,120 hours.

II. Operational Restrictions

1. All drums containing paint shall be covered with lids to minimize the loss of OC from the paint during the mixing operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and record the total OC emissions each year (the annual OC emissions shall be calculated by summing the daily OC emissions from section A.III.1.d for the calendar year), in tons, for this emissions unit.

2. The permittee shall collect and record the total number of gallons of coatings mixed each month for the mixing operation.

3. The permittee shall calculate and record the total number of gallons of coatings mixed each year in the mixing operation (the annual gallons of coatings mixed shall be calculated by summing the monthly gallons mixed from section B.III.2 for the calendar year).

4. The permittee shall collect and record the total number of hours this emissions unit was in operation each day.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily OC emission limitation of 19.8 pounds.

2. The permittee shall submit annual reports that summarize the actual annual OC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

3. The permittee shall submit annual reports that summarize the actual annual gallons of coatings mixed in this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the daily operating hours limitation of 10 hrs/day.

IV. Reporting Requirements (continued)

5. The permittee shall submit annual reports that summarize the total operating hours for this emissions unit (summation of the records in B.III.4 of this permit). These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations in Section B.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitation:
1.98 lbs OC/hr

Applicable Compliance Method: Compliance with the hourly OC emission limitation shall be determined as follows:

Multiply the maximum number of mixing units operated in an hour (9 units) by the maximum OC emissions from mixing (0.22 lb OC/hour of mixing).

1.b Emission Limitation:
19.8 lbs OC/day

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

1.c Emission Limitation:
3.1 tons OC/year

Compliance shall be based upon the record keeping requirements specified in section B.III.1 of this permit.

1.d Emission Limitation:
maximum daily operating hours for this emissions unit shall not exceed 10 hours

Compliance shall be based upon the record keeping requirements specified in section B.III.4 of this permit.

1.e Emission Limitation:
maximum annual operating hours for this emissions unit shall not exceed 3,120 hours

Compliance shall be based upon the summation of the records specified in section B.III.4 of this permit.

1.f Emission Limitation:
maximum annual gallons of coatings mixed in this emissions unit shall not exceed 51,721

Compliance shall be based upon the record keeping requirements specified in section B.III.3 of this permit.

VI. Miscellaneous Requirements

None

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