



State of Ohio Environmental Protection Agency

Street Address:

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

04/28/00

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

03-26-00-0040
ITT Automotive Archbold Plant
Jaimin Patel
701 East Lugbill
Archbold, OH 43502

Dear Jaimin Patel:

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 Northwest 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 Northwest District Office.

Very truly yours,

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
Northwest District Office
Indiana
Michigan



Ohio EPA

State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 04/28/00

Effective Date:

Expiration Date:

The duration of this permit will be five years.

This document constitutes issuance to:

ITT Automotive Archbold Plant
701 East Lugbill Road
Archbold, OH 43502

of a Title V permit for Facility ID: 03-26-00-0040

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

B003 (Space Heater)

Natural Gas Heating and Ventilation System - 11.75 MM BTU/hr

B004 (Space Heater)

Natural Gas Heating and Ventilation System - 11.75 MM BTU/hr

K008 (Procoat 2000 Line A)

Coating line with oven and incinerator

K009 (Procoat 2000 Line 2/B)

Coating line with oven and incinerator

P020 (#1 Braze Furnace)

Electric resistance brazing furnace - Inline Braze Process

P021 (#2 Braze Furnace)

Electric resistance brazing furnace - Inline Braze Process

P022 (#3 Braze Furnace)

Electric resistance brazing furnace - Inline Braze Process

P023 (#4 Braze Furnace)

Electric resistance brazing furnace - Inline Braze Process

Z010 (Procoat Line C)

Coating line with oven and incinerator

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

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

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

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 emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.6 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

If 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 Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

1.

The following insignificant emissions units are located at this facility:

B002	Plating Boiler
B005	Space Heater
L001	Cold Cleaner
L002	Cold Cleaner
L003	Cold Cleaner
L004	Cold Cleaner
L005	Cold Cleaner
P005	Tern Line
P006	Tern Line
P008	Weld Mill
P009	Weld Mill
P010	Plating Line
P018	Braze Preheater
P019	Braze Oven
P024	Brushing Station
P025	Brushing Station
P026	Brushing Station
P027	Brushing Station
P030	Armor Winder
P015	Metal Treatment
P016	Metal Treatment
P017	Metal Treatment
P031	Metal Treatment
P032	Metal Treatment
P033	Metal Treatment
Z001	Extruder
Z011	Pickling Line
Z012	Galfan Coating
Z013	Phosphate Claening
Z014	Weld Mill
P801	Facility Cleaning Solvent Usage

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: Space Heater (B003)

Activity Description: Natural Gas Heating and Ventilation System - 11.75 MM BTU/hr

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
11.75 mmBtu natural gas space heater #1	OAC rule 3745-31-05(A)(3) (PTI #03-5042)	0.16 lb nitrogen oxides (NOx)/mmBtu of actual heat input The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10(B)(1) and OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	20 percent opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-17-10(B)(1)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input

2. Additional Terms and Conditions

- 2.a Since natural gas is the only fuel fired in this emissions unit, no SO2 emission limitation is established by OAC Chapter 3745-18 for this emissions unit.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

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

IV. Reporting Requirements

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

V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall determine compliance with the limitation above by multiplying the emissions unit's maximum burning capacity of natural gas (11,750 cubic feet/hr) by the AP-42, Table 1.4-2 emission factor [1.9 lbs PE (filterable)/mmcu.ft.]*, and then dividing by the emissions unit's maximum heat input capacity (11.75 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the limitation above in accordance with the procedures and methods specified in OAC 3745-17-03(B)(9).

* This emission factor is specified in USEPA reference document AP-42, Fifth Edition(revised 7/98), Section 1.4,Table 1.4-2.

- 1.b** 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.c** Emission Limitation:
0.16 lb NOx/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall determine compliance with this emission limitation based upon multiplying the emissions unit's maximum burning capacity of natural gas (11,750 cubic feet/hr) by the AP-42, Table 1.4-1 emission factor [100 lbs NOx/mmcu.ft.]*, and then dividing by the emissions unit's maximum heat input capacity (11.75 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the limitation above pursuant to Method 7 of 40 CFR Part 60, Appandix A.

* This emission factor is specified in US EPA reference document AP-42, Fifth Edition(revised 7/98), Section 1.4,Table 1.4-1.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Space Heater (B004)

Activity Description: Natural Gas Heating and Ventilation System - 11.75 MM BTU/hr

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
11.75 mmBtu natural gas space heater #2	OAC rule 3745-31-05(A)(3) (PTI #03-5042)	0.16 lb nitrogen oxides (NOx)/mmBtu of actual heat input The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10(B)(1) and OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	20 percent opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-17-10(B)(1)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input

2. Additional Terms and Conditions

- Since natural gas is the only fuel fired in this emissions unit, no SO₂ emission limitation is established by OAC Chapter 3745-18 for this emissions unit.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

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

IV. Reporting Requirements

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

V. Testing Requirements

- Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall determine compliance with the limitation above by multiplying the emissions unit's maximum burning capacity of natural gas (11,750 cubic feet/hr) by the AP-42, Table 1.4-2 emission factor [1.9 lbs PE (filterable)/mmcu.ft.]*, and then dividing by the emissions unit's maximum heat input capacity (11.75 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the limitation above in accordance with the procedures and methods specified in OAC 3745-17-03(B)(9).

* This emission factor is specified in USEPA reference document AP-42, Fifth Edition(revised 7/98), Section 1.4,Table 1.4-2.

- 1.b** 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.c** Emission Limitation:
0.16 lb NOx/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall determine compliance with this emission limitation based upon multiplying the emissions unit's maximum burning capacity of natural gas (11,750 cubic feet/hr) by the AP-42, Table 1.4-1 emission factor [100 lbs NOx/mmcu.ft.]*, and then dividing by the emissions unit's maximum heat input capacity (11.75 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the limitation above pursuant to Method 7 of 40 CFR Part 60, Appandix A.

* This emission factor is specified in US EPA reference document AP-42, Fifth Edition(revised 7/98), Section 1.4,Table 1.4-1.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Procoat 2000 Line A (K008)
Activity Description: Coating line with oven and incinerator

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
procoat 2000 line A, with catalytic incinerator	OAC rule 3745-31-05(A)(3) (PTI #03-8656)	71.0 lbs volatile organic compounds (VOC)/day (from coating usage) 4.4 lbs VOC/gallon of coating, as applied (uncontrolled) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c).
	OAC rule 3745-21-09(U)(1)(c)	See A.2.a. 6.7 lbs VOC/gallon of coating solids, as applied (controlled)

2. Additional Terms and Conditions

- 2.a The VOC emissions from this emissions unit shall be controlled through the application of a permanent total enclosure with a 100% capture efficiency and a catalytic incinerator with a minimum 95% destruction efficiency.

II. Operational Restrictions

1. The emissions unit shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
3. The daily coating usage for this emissions unit shall not exceed 42.4 gallons.
4. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

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

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

- a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
 - c. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall maintain and operate monitoring devices and a recorder that simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.

3. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number for each coating employed, as applied.
 - b. The number of gallons of each coating employed.
 - c. The total number of gallons for all the coatings employed.
 - d. The VOC and coating solids contents of each coating employed, in lbs of VOC per gallon of coating, as applied, and in percent coating solids, by volume, as applied, respectively.
 - e. The total uncontrolled VOC emissions for all the coatings employed, i.e., the summation of (b x d) for all coatings, in pounds.
 - f. The total coating solids for all the coatings employed, i.e., the summation of (b x d) for all coatings, in gallons.
 - g. The total calculated controlled VOC emission rate for all the coatings employed, in pounds (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance, i.e., (e) multiplied by a factor of (1 - the overall control efficiency).
 - h. The calculated controlled VOC content of the coatings. i.e., (g/f), in pounds VOC/gallon of coating solids.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the VOC content limitations (in pounds/gallon of coating and in pounds/gallon of coating solids) for this emissions unit.

IV. Reporting Requirements (continued)

2. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed did not comply with the temperature restrictions specified above.
3. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the daily VOC emission limitation and the daily coating usage restriction.
5. If no deviations occurred during a reporting period then the deviation reports submitted by the permittee shall state so. The permittee shall submit the reports to the Director (appropriate District Office or local air agency). Refer to General Term and Condition A.1.c. for the required quarterly report due dates.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. Emission testing shall be conducted within 6 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs (which will be determined as the product of the capture efficiency and the destruction efficiency of the catalytic incinerator) and the mass emission rate for VOC.
 - c. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
 - i. Method 25A of 40 CFR Part 60, Appendix A.
 - ii. The capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.
 - iii. The control efficiency of the catalytic incinerator shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of volatile organic compounds between the inlet and outlet of the vapor control system.

V. Testing Requirements (continued)

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

3. During any emission testing for this emissions unit, the permittee shall record the following additional information:
- a. the average temperature of the exhaust gases immediately before the catalyst bed, in degrees Fahrenheit;
 - b. the average temperature difference across the catalyst bed, in degrees Fahrenheit; and
 - c. the minimum pressure differential established, in inches of water.
4. Compliance with the emission limitations/usage restrictions in Section A.I of this permit shall be determined in accordance with the following methods:
- 4.a** Emissions Limitations:
4.4 lbs VOC/gallon of coating
6.7 lbs VOC/gallon of coating solids
- Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section A.III.3 of this permit.
- 4.b** Emissions Limitation:
71.0 lbs VOC/day
- Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements in section A.III.3 of this permit and the results of emission testing conducted in accordance with the methods and procedures specified in section A.V.1 of this permit.
- 4.c** Emission Limitation-
95% destruction efficiency for VOC
- Applicable Compliance Method-
The permittee shall demonstrate compliance with the limitation above based on the results of emission testing, conducted in accordance with the methods and procedures specified in Section A.V.1 of this permit.
- 4.d** Coating Usage Restriction:
42.4 gallons/day
- Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

V. Testing Requirements (continued)

5. Any determination of VOC content (VOC means all the volatile organic compounds that are in a coating/cleanup material expressed in pounds of VOC per gallon of solids or per gallon of coating), solids content, or density of each coating shall be based on the coatings as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coatings, or from data determined by an analysis of each coating, as received by Reference Method 24. The Ohio EPA may require the company, if it used formulation data supplied by the manufacturer, to determine the VOC contents of the coatings by Reference Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
procoat 2000 line A, with catalytic incinerator	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

- Modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Procoat 2000 Line 2/B (K009)
Activity Description: Coating line with oven and incinerator

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
procoat 2000 line B, with catalytic incinerator	OAC rule 3745-31-05(A)(3) (PTI #03-8104)	148.9 lbs volatile organic compounds (VOC)/day (from coating usage) 4.4 lbs VOC/gallon of coating, as applied (uncontrolled) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c).
	OAC rule 3745-21-09(U)(1)(c)	See A.2.a. 6.7 lbs VOC/gallon of coating solids, as applied (controlled)

2. Additional Terms and Conditions

- 2.a The VOC emissions from this emissions unit shall be controlled through the application of a permanent total enclosure with a 100% capture efficiency and a catalytic incinerator with a minimum 95% destruction efficiency.

II. Operational Restrictions

1. The emissions unit shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
3. The daily coating usage for this emissions unit shall not exceed 88.5 gallons.

II. Operational Restrictions (continued)

4. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

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

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

- a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
 - c. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall maintain and operate monitoring devices and a recorder that simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.

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

3. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number for each coating employed, as applied.
 - b. The number of gallons of each coating employed.
 - c. The total number of gallons for all the coatings employed.
 - d. The VOC and coating solids contents of each coating employed, in lbs of VOC per gallon of coating, as applied, and in percent coating solids, by volume, as applied, respectively.
 - e. The total uncontrolled VOC emissions for all the coatings employed, i.e., the summation of (b x d) for all coatings, in pounds.
 - f. The total coating solids for all the coatings employed, i.e., the summation of (b x d) for all coatings, in gallons.
 - g. The total calculated controlled VOC emission rate for all the coatings employed, in pounds (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance, i.e., (e) multiplied by a factor of (1 - the overall control efficiency).
 - h. The calculated controlled VOC content of the coatings. i.e., (g/f), in pounds VOC/gallon of coating solids.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the VOC content limitations (in pounds/gallon of coating and in pounds/gallon of coating solids) for this emissions unit.
2. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed did not comply with the temperature restrictions specified above.
3. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the daily VOC emission limitation and the daily coating usage restriction.
5. If no deviations occurred during a reporting period then the deviation reports submitted by the permittee shall state so. The permittee shall submit the reports to the Director (appropriate District Office or local air agency). Refer to General Term and Condition A.1.c. for the required quarterly report due dates.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. Emission testing shall be conducted within 6 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs (which will be determined as the product of the capture efficiency and the destruction efficiency of the catalytic incinerator) and the mass emission rate for VOC.
 - c. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
 - i. Method 25A of 40 CFR Part 60, Appendix A.
 - ii. The capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.
 - iii. The control efficiency of the catalytic incinerator shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of volatile organic compounds between the inlet and outlet of the vapor control system.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
3. During any emission testing for this emissions unit, the permittee shall record the following additional information:
 - a. the average temperature of the exhaust gases immediately before the catalyst bed, in degrees Fahrenheit;
 - b. the average temperature difference across the catalyst bed, in degrees Fahrenheit; and
 - c. the minimum pressure differential established, in inches of water.
4. Compliance with the emission limitations/usage restrictions in Section A.I of this permit shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

- 4.a** Emissions Limitations:
4.4 lbs VOC/gallon of coating
6.7 lbs VOC/gallon of coating solids

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section A.III.3 of this permit.

- 4.b** Emissions Limitation:
148.9 lbs VOC/day

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements in section A.III.3 of this permit and the results of emission testing conducted in accordance with the methods and procedures specified in section A.V.1 of this permit.

- 4.c** Emission Limitation-
95% destruction efficiency for VOC

Applicable Compliance Method-
The permittee shall demonstrate compliance with the limitation above based on the results of emission testing, conducted in accordance with the methods and procedures specified in Section A.V.1 of this permit.

- 4.d** Coating Usage Restriction:
88.5 gallons/day

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

- 5.** Any determination of VOC content (VOC means all the volatile organic compounds that are in a coating/cleanup material expressed in pounds of VOC per gallon of solids or per gallon of coating), solids content, or density of each coating shall be based on the coatings as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coatings, or from data determined by an analysis of each coating, as received by Reference Method 24. The Ohio EPA may require the company, if it used formulation data supplied by the manufacturer, to determine the VOC contents of the coatings by Reference Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
procoat 2000 line B, with catalytic incinerator	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

- Modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #1 Braze Furnace (P020)
Activity Description: Electric resistance brazing furnace - Inline Braze Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
braze furnace #1	OAC rule 3745-17-11 (B)	None, see A.I.2.a.
	OAC rule 3745-17-07 (A)	None, see A.I.2.b.
	OAC rule 3745-21-07(G)	None, see A.I.2.c.

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply since the facility is located in Fulton County.
- 2.b 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 OAC rule 3745-17-11 is not applicable.
- 2.c OAC rule 3745-21-07(G) is not applicable because the facility is not located in a "Priority 1" county and the emissions unit was installed prior to February 15, 1972.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #2 Braze Furnace (P021)

Activity Description: Electric resistance brazing furnace - Inline Braze Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
braze furnace #2	OAC rule 3745-17-11 (B)	None, see A.I.2.a.
	OAC rule 3745-17-07 (A)	None, see A.I.2.b.
	OAC rule 3745-21-07(G)	None, see A.I.2.c.

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply since the facility is located in Fulton County.
- 2.b 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 OAC rule 3745-17-11 is not applicable.
- 2.c OAC rule 3745-21-07(G) is not applicable because the facility is not located in a "Priority 1" county and the emissions unit was installed prior to February 15, 1972.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #3 Braze Furnace (P022)

Activity Description: Electric resistance brazing furnace - Inline Braze Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
braze furnace #3	OAC rule 3745-17-11 (B)	None, see A.I.2.a.
	OAC rule 3745-17-07 (A)	None, see A.I.2.b.
	OAC rule 3745-21-07(G)	None, see A.I.2.c.

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply since the facility is located in Fulton County.
- 2.b 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 OAC rule 3745-17-11 is not applicable.
- 2.c OAC rule 3745-21-07(G) is not applicable because the facility is not located in a "Priority 1" county and the emissions unit was installed prior to February 15, 1972.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: #4 Braze Furnace (P023)

Activity Description: Electric resistance brazing furnace - Inline Braze Process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
braze furnace #4	OAC rule 3745-17-11 (B)	None, see A.I.2.a.
	OAC rule 3745-17-07 (A)	None, see A.I.2.b.
	OAC rule 3745-21-07(G)	None, see A.I.2.c.

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply since the facility is located in Fulton County.
- 2.b 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 OAC rule 3745-17-11 is not applicable.
- 2.c OAC rule 3745-21-07(G) is not applicable because the facility is not located in a "Priority 1" county and the emissions unit was installed prior to February 15, 1972.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Procoat Line C (Z010)
Activity Description: Coating line with oven and incinerator

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
procoat 2000 line C, with catalytic incinerator (emissions unit K011)	OAC rule 3745-31-05(A)(3) (PTI #03-13079)	0.82 lb volatile organic compounds (VOC)/hour (from coating usage) 3.6 tons VOC/year (from coating usage) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c).
	OAC rule 3745-21-09(U)(1)(c)	See A.2.a. 6.7 lbs VOC/gallon of coating solids, as applied (controlled)

2. Additional Terms and Conditions

- The VOC emissions from this emissions unit shall be controlled through the application of a permanent total enclosure with a 100% capture efficiency and a catalytic incinerator with a minimum 95% destruction efficiency.

II. Operational Restrictions

- The emissions unit shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204.
- The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
- The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

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

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

- a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
 - b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
 - c. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall maintain and operate monitoring devices and a recorder that simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.

3. The permittee shall collect and record the following information each day for this emissions unit:
 - a. The name and identification number for each coating employed, as applied.
 - b. The number of gallons of each coating employed.
 - c. The total number of hours the emissions unit was in operation.
 - d. The VOC and coating solids contents of each coating employed, in lbs of VOC per gallon of coating, as applied, and in percent coating solids, by volume, as applied, respectively.
 - e. The total uncontrolled VOC emissions for all the coatings employed, i.e., the summation of (b x d) for all coatings, in pounds.
 - f. The total calculated controlled VOC emission rate for all the coatings employed, in pounds (the controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance, i.e., (e) multiplied by a factor of (1 - the overall control efficiency).
 - g. The average hourly VOC emission rate (f/c), in pounds (average).
 - h. The total coating solids for all the coatings employed, i.e., the summation of (b x d) for all coatings, in gallons.
 - i. The calculated controlled VOC content of the coatings. i.e., (f/h), in pounds VOC/gallon of coating solids.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the VOC contents (in pounds/gallon of coating and in pounds/gallon of coating solids) restrictions for this emissions unit.
2. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed did not comply with the temperature restrictions specified above.
3. The permittee shall submit pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the hourly VOC emission limitation.
5. If no deviations occurred during a reporting period then the deviation reports submitted by the permittee shall state so. The permittee shall submit the reports to the Director (appropriate District Office or local air agency). Refer to General Term and Condition A.1.c. for the required quarterly report due dates.
6. The permittee shall submit annual reports that summarize the actual annual VOC emissions for this emissions unit. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. Emission testing shall be conducted within 6 months prior to the expiration of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the overall control system efficiency for VOCs (which will be determined as the product of the capture efficiency and the destruction efficiency of the catalytic incinerator) and the mass emission rate for VOC.
 - c. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
 - i. Method 25A of 40 CFR Part 60, Appendix A.
 - ii. The capture efficiency shall be determined using the test methods specified in 40 CFR Part 51, Appendix M, Method 204 through 204F, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency as specified in the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.
 - iii. The control efficiency of the catalytic incinerator shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and shall measure the percent reduction in mass emissions of volatile organic compounds between the inlet and outlet of the vapor control system.

V. Testing Requirements (continued)

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

3. During any emission testing for this emissions unit, the permittee shall record the following additional information:
- the average temperature of the exhaust gases immediately before the catalyst bed, in degrees Fahrenheit;
 - the average temperature difference across the catalyst bed, in degrees Fahrenheit; and
 - the minimum pressure differential established, in inches of water.
4. Compliance with the emission limitations/usage restrictions in Section A.I of this permit shall be determined in accordance with the following methods:
- 4.a Emissions Limitation:
6.7 lbs VOC/gallon of coating solids
- Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section A.III.3 of this permit.
- 4.b Emissions Limitation:
0.82 lb VOC/hour
- Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements in section A.III.3 of this permit and the results of emission testing, conducted in accordance with the methods and procedures specified in section A.V.1 of this permit.
- 4.c Emission Limitation-
95% destruction efficiency for VOC
- Applicable Compliance Method-
The permittee shall demonstrate compliance with the limitation above based upon the results of emission testing, conducted in accordance with the methods and procedures specified in Section A.V.1 of this permit.
- 4.d Emissions Limitation:
3.6 tons VOC/year
- Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements in section A.III.3 of this permit and shall be the summation of the daily VOC emission rates for the calendar year.

V. Testing Requirements (continued)

5. Any determination of VOC content (VOC means all the volatile organic compounds that are in a coating/cleanup material expressed in pounds of VOC per gallon of solids or per gallon of coating), solids content, or density of each coating shall be based on the coatings as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coatings, or from data determined by an analysis of each coating, as received by Reference Method 24. The Ohio EPA may require the company, if it used formulation data supplied by the manufacturer, to determine the VOC contents of the coatings by Reference Method 24.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
procoat 2000 line C, with catalytic incinerator (emissions unit K011)	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

- Modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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