OhioEPA

State of Ohio Environmental Protection Agency

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

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

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

01/31/01 **CERTIFIED MAIL**

RE: Proposed Title V Chapter 3745-77 permit
14-09-00-0037
Pre Finish Metals - Middletown

Attn: Genevieve Damico AR-18J
United States Enviromental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for Pre Finish Metals - Middletown, has been created in Ohio EPA's State Air Resources System (STARS) on 01/31/01, for review by USEPA. This proposed action is identified in STARS as 3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact Mike Ahern, DAPC Permit Management Unit supervisor at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

Thomas G. Rigo

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

cc: Hamilton County Dept. of Environmental Services
Becky Castle, DAPC PMU

OhioEPA

Ohio EPA

State of Ohio Environmental Protection Agency

TITLE V PERMIT

Date: 01/31/01

PROPOSED

Effective Date:

Expiration Date:

This document constitutes issuance to:

Pre Finish Metals - Middletown
2400 Yankee Road
Middletown, OH 45044

of a Title V permit for Facility ID: 14-09-00-0037

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:
B002 (Steam Boiler)
Standby natural gas/LPG 25.1 MMBTU steam boiler

K001 (Coating Line)
Coil coating paint line; includes four coating stations, two bake ovens, and two thermal incinerators

P001 (Paint mix room)
Paint mix operations and clean-up

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:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Rd
Cincinnati, OH 45219-2660
(513) 946-7777

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

   i. The date, place (as defined in the permit), and time of sampling or measurements.
   ii. The date(s) analyses were performed.
   iii. The company or entity that performed the analyses.
   iv. The analytical techniques or methods used.
   v. The results of such analyses.
   vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

   i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
   ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
   iii. Written reports, which identify any deviations from the federally enforceable <u>monitoring</u>, <u>recordkeeping</u>, <u>and reporting requirements</u> contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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

8. Marketable Permit Programs

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

9. Reasonably Anticipated Operating Scenarios

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

10. Reopening for Cause

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

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

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

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

   i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
   ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
   iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
   iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

   i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
   ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:

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

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

(c) Whether compliance was continuous or intermittent.

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

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

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

13. Permit Shield

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

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

14. Operational Flexibility

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

15. Emergencies

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

16. Off Permit Changes

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

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

b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or

activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

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

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

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

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

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

17. Compliance Method Requirements

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

18. Insignificant Activity

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

B. State Only Enforceable Section

1. Permit to Install Requirement

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

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

B001 - Jackson-Church Model MU-240 Gas-Fired Heater (Three Space Heaters)
Z001 - Parts Washer
Z002 - Wet Section Burners

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: Steam Boiler (B002)

Activity Description: Standby natural gas/LPG 25.1 MMBTU steam boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
25.1 mmBtu/hr natural gas and/or liquified petroleum (propane) gas (LPG)-fired steam boiler, with low NOx burner	40 CFR, Part 60, Subpart Dc	None, see A.II.1.
	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)(1)	less stringent than the limitations outlined under OAC rule 3745-31-05
	OAC rule 3745-31-05 PTI no. 14-3941	0.15 lb of carbon monoxide (CO)/mmBtu of actual heat input 0.084 lb of nitrogen oxides (NOx)/mmBtu of actual heat input 0.001 lb of sulfur dioxide (SO2)/mmBtu of actual heat input 0.016 lb of volatile organic compounds (VOC)/mmBtu of actual heat input 0.01 lb of PE/mmBtu of actual heat input 16.6 TPY of CO 9.24 TPY of NOx 0.13 TPY of SO2 1.75 TPY of VOC 1.1 TPY of PE See A.2.a. and A.2.b.

2. Additional Terms and Conditions

2.a The emission limits in Section A.I.1 are established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting are required to ensure compliance with these limits.

2.b The permittee shall employ a low NOx burner for this emissions unit.

II. Operational Restrictions

1. The permittee shall burn only natural gas and/or LPG 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 and/or LPG, 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 and/or LPG was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

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

1.a Emission Limitations:
0.15 lb of CO/mmBtu of actual heat input, 16.6 TPY of CO
0.084 lb of NOx/mmBtu of actual heat input, 9.24 TPY of NOx
0.001 lb of SO2/mmBtu of actual heat input, 0.13 TPY of SO2
0.016 lb of VOC/mmBtu of actual heat input, 1.75 TPY of VOC
0.01 lb of PE/mmBtu of actual heat input, 1.1 TPY of PE

Applicable Compliance Method:
The above lb/mmBtu emission limits are based on the manufacturer's guaranteed emission levels for the combustion of natural gas and LPG for this emissions unit, and represent the emission unit's potential to emit. These limits represent worst case emission for CO, SO2, VOC, and PE when burning natural gas, and worst case emissions for NOx when burning LPG for this emissions unit.

Compliance with the annual emission limitations above is assumed as long as compliance with the lb/mmBtu limitations is maintained.

If required, the permittee shall demonstrate compliance with the above lb/mmBtu emission limits based upon the following:

i. for CO: Method 10, 40 CFR, Part 60, Appendix A;
ii. for NOx: Method 7, 40 CFR, Part 60, Appendix A;
iii. for SO2: Method 6, 40 CFR, Part 60, Appendix A;
iv. for VOC: Method 25, 40 CFR, Part 60, Appendix A; and
v. for PE: Method 5, 40 CFR, Part 60, Appendix A.

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

Applicable Compliance Method-
Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR, Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
25.1 mmBtu/hr natural gas and/or LPG-fired steam boiler, with low NOx burner	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coating Line (K001)

Activity Description: Coil coating paint line; includes four coating stations, two bake ovens, and two thermal incinerators

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
coil coating paint line; includes four coating stations, two bake ovens, and two thermal incinerators	OAC rule 3745-21-09(E)	See A.I.2.a.
	OAC rule 3745-21-09(B)(6)	See A.I.2.b.

2. Additional Terms and Conditions

2.a Except as provided in A.I.2.b, when employing water-based coatings, the volatile organic compound (VOC) content of each coating employed shall not exceed 2.6 pounds of VOC per gallon of coating, excluding water and exempt solvents.

2.b When employing water-based coatings with a VOC content greater than 2.6 pounds per gallon or when employing solvent-based coatings in any coating station, the VOC emissions from that coating line shall be controlled using a thermal incinerator. The capture and the control equipment shall provide not less than an 81% reduction, by weight, in overall VOC emissions from the coating line and the thermal incinerator shall have a destruction efficiency of not less than 90%, by weight, for the VOC emissions vented to the thermal incinerator.

II. Operational Restrictions

1. The average combustion temperature within each thermal incinerator, 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 combustion temperature 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 collect and record the following information each day for the line when employing complying coatings (water-based coatings with a VOC content of less than or equal to 2.6 lbs of VOC per gallon of coating, excluding water and exempt solvents):

a. the name and identification number of each coating; and
b. the VOC content of each coating, in lbs/gallon (excluding water and exempt solvents), as applied.

If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

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

2. The permittee shall operate and maintain a continuous temperature monitor and recorder for each of the two thermal incinerators which measures and records the temperature within each thermal incinerator 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 monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. All 3-hour blocks of time during which the average combustion temperature within each thermal incinerator, when the emissions unit was in operation and a thermal incinerator was required per Term A.I.2.b, was more than 50 degrees Fahrenheit below the average combustion temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

IV. Reporting Requirements

1. The permittee shall submit quarterly summaries of the following records:

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

b. All 3-hour blocks of time during which the average combustion temperature within either thermal incinerator, when the emissions unit was in operation and a thermal incinerator was required per Term A.I.2.b, was more than 50 degrees Fahrenheit below the average combustion temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 30, October 30, and January 30, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit deviation (excursion) reports for all periods when non-complying coatings (i.e., for VOC content) were employed without the VOC emissions being vented to the thermal incinerator. These reports shall include an estimate of the VOC emissions during the excursion event.

V. Testing Requirements

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

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

b. The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for VOC.

c. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR, Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services (HCDES).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the HCDES. 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 HCDES's refusal to accept the results of the emission test(s).

Personnel from the HCDES 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 HCDES 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 HCDES.

2. USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
coil coating paint line; includes four coating stations, two bake ovens, and two thermal incinerators	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall not operate more than two coating stations at any time.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the number of coating stations operated at the same time each day.

IV. Reporting Requirements

1. The permittee shall submit quarterly reports which identify any day in which more than two coating stations were operated at the same time. These quarterly reports shall be submitted by April 30, July 30, October 30, and January 30, and shall cover the records for the previous calendar quarters.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint mix room (P001)

Activity Description: Paint mix operations and clean-up

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint room mix operations, including cleanup	OAC rule 3745-21-07(G)	See A.I.2.
	OAC rule 3745-31-05 PTI 14-3894	83.99 lbs of organic compounds (OC)/day
		15.33 TPY of OC
		See A.II.

2. Additional Terms and Conditions

2.a The permittee shall not employ any liquid organic material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2.b The 83.99 lbs/day and 15.33 TPY OC emission limitations are established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping and reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

1. The amount of paint dispensed in the tote-filling operation in this emissions unit shall not exceed 6000 gallons per day.

2. The amount of cleanup material used in this emissions unit shall not exceed 240 pounds per day.

3. Tightly-fitting covers shall be in place for each mixer while in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:

a. the company identification of each material employed;

b. a determination of whether each material employed is a photochemically reactive material;

c. the total amount (in gallons) of paint dispensed; and

d. the amount of cleanup material (in pounds) used during the day (calculated by multiplying the usage of cleanup material, in gallons, by the density of the cleanup material, in pounds per gallon).

IV. Reporting Requirements

1. The permittee shall submit to the Hamilton County Department of Environmental Services (HCDES) reports which include all daily records showing the use of photochemically reactive materials. These reports shall be submitted to HCDES within 45 days of the date of occurrence.

2. The permittee shall submit deviation (excursion) reports which list all exceedances of the usage restrictions listed in section A.II.1 and 2 of this permit.

V. Testing Requirements

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

1.a Emission Limitations:
83.99 lbs of OC/day
15.33 TPY of OC

Applicable Compliance Method:
The permittee shall determine compliance with the daily limitation above as follows:

i. emissions from tote-filling:

L = 12.46 x S x P x M/T

where:

L = dispensing loss (lbs OC/1000 gallons)
S = saturation factor for splash loading (1.45)
P = vapor pressure (0.59 psia)
M = molecular weight (99 lbs/lb-mol)
T = temperature of liquid (528 degrees R)

L = 1.999 lbs OC/1000 gallons

OC emissions (lbs/day) = L x maximum filling rate (i.e., 6000 gallons/day)
OC emissions (lbs/day) = 11.99 lbs/day;

ii. emissions from tote-mixing:

OC emissions (lbs/day) = maximum hourly emissions (2 lbs/hr*) x 24 hrs/day = 48 lbs/day

* This is based on the results of an emission testing conducted on a similar emissions unit.

iii. emissions from cleanup operations:

OC emissions (lbs/day) = maximum solvent usage rate per hour (i.e., 10 lbs/hr) x 0.1 lb of OC/lb of solvent used** x 24 hrs/day = 24 lbs/day

** This is based on a 90% recovery rate of the solvent used, or 10% of the OC from the used solvent released as fugitive emissions.

iv. sum OC emissions from 1.a.i, 1.a.ii, and 1.a.iii above.

Compliance with the annual limitation will be shown as long as compliance with the daily limitation is maintained (the annual limitation was calculated by multiplying the daily limitation by 365 and dividing by 2000).

V. Testing Requirements (continued)

1.b Applicable Limitations:
6,000 gallons of paint per day
240 pounds of cleanup material per day

Applicable Compliance Method:
The permittee shall demonstrate compliance with these usage restrictions through the record keeping requirements specified in Section A.III.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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint room mix operations, including cleanup	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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