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

11/14/01

**RE: Proposed Title V Chapter 3745-77 Permit**
**03-86-01-0161**
**The Ohio Art Company**

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 The Ohio Art Company, has been created in Ohio EPA's State Air Resources System (STARS) on 11/14/01, 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: Northwest District Office
File, DAPC PMU

State of Ohio Environmental Protection Agency

# PROPOSED TITLE V PERMIT

| Issue Date: 11/14/01 | Effective Date: To be entered upon final issuance | Expiration Date: To be entered upon final issuance |
|---|---|---|

This document constitutes issuance of a Title V permit for Facility ID: 03-86-01-0161 to:
The Ohio Art Company
One Toy Street
Bryan, OH 43506

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

K001 (Coating Line C-1)
Lithographic coating operation for sheet metal with oven and Control unit. This is OART Line C-1.

K002 (Coating Line C-2)
Lithographic coating operation for sheet metal with oven and Control Unit. This is OART Line C-2.

K003 (Coating Line C-3)
Lithographic coating operation for sheet metal with oven and Control Unit. This is OART Line C-3.

K007 (Coating Line C-7 )
Litho coating sheet metal, with Oven. In 1996-99, EPA ID was K008. ID changed per OEPA/NWDO. This is OART Line C-7.

K010 (UV#1 4ClrCoat/Press)
UV printing operation on coated sheet metal. This is OART Line UV#1

K011 (LTG Coater C-6)
Lithographic coating operation for sheet metal with oven and Control unit. This is OART Line C-6..

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 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 <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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

# Part II - Specific Facility Terms and Conditions

## A. State and Federally Enforcable Section

**None**

## B. State Only Enforceable Section

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

K004 - Line P-4 printing line;
K005 - Line P-5 printing line;
K006 - Line UV-2 printing line;
K008 - Line P-8 printing line;
K009 - Line UV-2 printing line; and
Z004 - Line UV-4 printing line (2 color press).

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 PTI for the emissions unit.

# Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Coating Line C-1 (K001)

**Activity Description:** Lithographic coating operation for sheet metal with oven and Control unit. This is OART Line C-1.

## 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 |
|---|---|---|
| coating line C-1, with thermal incinerator | OAC rule 3745-21-09 (U)(1) | See A.I.2.a. |

**2. Additional Terms and Conditions**

**2.a** In lieu of complying with the pounds of VOC per gallon of coating (excluding water and exempt solvents) limitation contained in OAC rule 3745-21-09(U), the permittee shall comply with the requirements of OAC rule 3745-21-09(B)(6) by employing a capture and control (thermal incinerator) system that shall achieve not less than an eighty one percent reduction, by weight, in the overall VOC emissions from the coating line and not less than ninety percent, by weight, destruction for the VOC emissions vented to the thermal incinerator.

### II. Operational Restrictions

**1.** The permittee shall operate the thermal incinerator whenever this emissions unit is in operation.

**2.** The average combustion temperature, 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.

### III. Monitoring and/or Record Keeping Requirements

**1.** The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the 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 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 for each day for the control equipment:

a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the emissions unit was in operation.

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

**2.** The permittee shall maintain daily records that document any time periods when the thermal incinerator was not in service when the emissions unit was in operation.

## IV. Reporting Requirements

**1.** The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. These deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

**2.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the thermal incinerator was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

**3.** The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the emissions unit was in operation. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

## V. Testing Requirements

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

Emission Limitation:
minimum 81% overall VOC reduction from the coating line and a minimum 90% VOC destruction efficiency for the thermal incinerator

Applicable Compliance Method:

Compliance with the emission limitations above shall be based on the results of emission testing conducted in accordance with the procedures outlined in Section V.2 of this permit.

**2.** Within 3 months following the issuance of this permit and within six months prior to permit expiration, the permittee shall conduct, or have conducted, performance testing for this emissions unit in order 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 thermal incinerator. 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. The destruction efficiency 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. The test method selected shall be based on a consideration of the diversity of organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. The test(s) shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

## V. Testing Requirements (continued)

**3.** Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notificaiton for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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 assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or performance of the control equipment.

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

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**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 C-2 (K002)

**Activity Description:** Lithographic coating operation for sheet metal with oven and Control Unit. This is OART Line C-2.

## 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 |
|---|---|---|
| coating line C-2, with thermal incinerator | OAC rule 3745-21-09 (U)(1) | See A.I.2.a. |

**2. Additional Terms and Conditions**

**2.a** In lieu of complying with the pounds of VOC per gallon of coating (excluding water and exempt solvents) limitation contained in OAC rule 3745-21-09(U), the permittee shall comply with the requirements of OAC rule 3745-21-09(B)(6) by employing a capture and control (thermal incinerator) system that shall achieve not less than an eighty one percent reduction, by weight, in the overall VOC emissions from the coating line and not less than ninety percent, by weight, destruction for the VOC emissions vented to the thermal incinerator.

### II. Operational Restrictions

**1.** The permittee shall operate the thermal incinerator whenever this emissions unit is in operation.

**2.** The average combustion temperature, 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.

### III. Monitoring and/or Record Keeping Requirements

**1.** The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the 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 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 for each day for the control equipment:

a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the emissions unit was in operation.

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

**2.** The permittee shall maintain daily records that document any time periods when the thermal incinerator was not in service when the emissions unit was in operation.

## IV. Reporting Requirements

**1.** The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. These deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

**2.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the thermal incinerator was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

**3.** The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the emissions unit was in operation. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

## V. Testing Requirements

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

Emission Limitation:
minimum 81% overall VOC reduction from the coating line and a minimum 90% VOC destruction efficiency for the thermal incinerator

Applicable Compliance Method:

Compliance with the emission limitations above shall be based on the results of emission testing conducted in accordance with the procedures outlined in Section V.2 of this permit.

**2.** Within 3 months following the issuance of this permit and within six months prior to permit expiration, the permittee shall conduct, or have conducted, performance testing for this emissions unit in order 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 thermal incinerator. 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. The destruction efficiency 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. The test method selected shall be based on a consideration of the diversity of organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. The test(s) shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

## V. Testing Requirements (continued)

**3.** Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notificaiton for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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 assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or performance of the control equipment.

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

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**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 C-3 (K003)

**Activity Description:** Lithographic coating operation for sheet metal with oven and Control Unit. This is OART Line C-3.

## 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 |
|---|---|---|
| coating line C-3, with thermal incinerator | OAC rule 3745-21-09 (U)(1) | See A.I.2.a. |

**2. Additional Terms and Conditions**

**2.a** In lieu of complying with the pounds of VOC per gallon of coating (excluding water and exempt solvents) limitation contained in OAC rule 3745-21-09(U), the permittee shall comply with the requirements of OAC rule 3745-21-09(B)(6) by employing a capture and control (thermal incinerator) system that shall achieve not less than an eighty one percent reduction, by weight, in the overall VOC emissions from the coating line and not less than ninety percent, by weight, destruction for the VOC emissions vented to the thermal incinerator.

### II. Operational Restrictions

**1.** The permittee shall operate the thermal incinerator whenever this emissions unit is in operation.

**2.** The average combustion temperature, 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.

### III. Monitoring and/or Record Keeping Requirements

**1.** The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the 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 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 for each day for the control equipment:

a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the emissions unit was in operation.

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

**2.** The permittee shall maintain daily records that document any time periods when the thermal incinerator was not in service when the emissions unit was in operation.

## IV. Reporting Requirements

**1.** The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. These deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

**2.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the thermal incinerator was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

**3.** The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the emissions unit was in operation. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

## V. Testing Requirements

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

Emission Limitation:
minimum 81% overall VOC reduction from the coating line and a minimum 90% VOC destruction efficiency for the thermal incinerator

Applicable Compliance Method:

Compliance with the emission limitations above shall be based on the results of emission testing conducted in accordance with the procedures outlined in Section V.2 of this permit.

**2.** Within 3 months following the issuance of this permit and within six months prior to permit expiration, the permittee shall conduct, or have conducted, performance testing for this emissions unit in order 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 thermal incinerator. 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. The destruction efficiency 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. The test method selected shall be based on a consideration of the diversity of organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. The test(s) shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

## V. Testing Requirements (continued)

**3.** Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notificaiton for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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 assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or performance of the control equipment.

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

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**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 C-7 (K007)

**Activity Description:** Litho coating sheet metal, with Oven. In 1996-99, EPA ID was K008. ID changed per OEPA/NWDO. This is OART Line C-7.

## 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 |
|---|---|---|
| coating line C-7, with thermal incinerator | OAC rule 3745-21-09 (U)(1) | See A.I.2.a. |

**2. Additional Terms and Conditions**

**2.a** In lieu of complying with the pounds of VOC per gallon of coating (excluding water and exempt solvents) limitation contained in OAC rule 3745-21-09(U), the permittee shall comply with the requirements of OAC rule 3745-21-09(B)(6) by employing a capture and control (thermal incinerator) system that shall achieve not less than an eighty one percent reduction, by weight, in the overall VOC emissions from the coating line and not less than ninety percent, by weight, destruction for the VOC emissions vented to the thermal incinerator.

### II. Operational Restrictions

**1.** The permittee shall operate the thermal incinerator whenever this emissions unit is in operation.

**2.** The average combustion temperature, 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.

### III. Monitoring and/or Record Keeping Requirements

**1.** The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the 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 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 for each day for the control equipment:

a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the emissions unit was in operation.

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

**2.** The permittee shall maintain daily records that document any time periods when the thermal incinerator was not in service when the emissions unit was in operation.

## IV. Reporting Requirements

**1.** The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above. These deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

**2.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the thermal incinerator was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

**3.** The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the emissions unit was in operation. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

## V. Testing Requirements

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

Emission Limitation:
minimum 81% overall VOC reduction from the coating line and a minimum 90% VOC destruction efficiency for the thermal incinerator

Applicable Compliance Method:

Compliance with the emission limitations above shall be based on the results of emission testing conducted in accordance with the procedures outlined in Section V.2 of this permit.

**2.** Within 3 months following the issuance of this permit and within six months prior to permit expiration, the permittee shall conduct, or have conducted, performance testing for this emissions unit in order 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 thermal incinerator. 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. The destruction efficiency 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. The test method selected shall be based on a consideration of the diversity of organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. The test(s) shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

## V. Testing Requirements (continued)

**3.** Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notificaiton for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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 assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or performance of the control equipment.

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

## VI. Miscellaneous Requirements

**1.** This emissions unit is currently operating in violation of the VOC content limitation of 3.0 lbs VOC/gallon coating, excluding water and exempt solvents contained in OAC rule 3745-21-09(U)(1)(i). In order to bring this emissions unit into compliance, the permittee has chosen to install a thermal incinerator and comply with OAC rule 3745-21-09(B)(6). The permittee shall perform the following to bring this emissions unit into compliance:

**1.a** select and order the thermal incinerator from the supplier by 3/1/2002;

**1.b** complete the installation of the thermal incinerator by 9/2/2002; and

**1.c** complete performance testing on the thermal incinerator serving this emissions unit and achieve final compliance by 12/16/2002.

**2.** The permittee performed modifications, as defined in OAC rule 3745-31-01 (KK), on this emissions unit without first applying for and obtaining a permit to install (PTI), in violation of OAC rule 3745-31-02 (A)(1). Therefore, as the initial step for this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete permit to install application within 2 months following the issuance of this permit.

## 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 |
|---|---|---|

**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:** UV#1 4ClrCoat/Press (K010)

**Activity Description:** UV printing operation on coated sheet metal. This is OART Line UV#1

## 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 |
|---|---|---|
| 4-color lithographic press, coating line UV-1 | OAC rule 3745-21-09 (U)(1)(a)(i) | 3.0 pounds volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents |
| | OAC rule 3745-31-05<br>PTI #03-13026 | 0.30 lb VOC/gallon of coating<br><br>2.1 lbs VOC/hour, 9.2 tons VOC/year, from coating usage<br><br>166.8 pounds VOC/month, 1.0 ton VOC/year, from cleanup material usage<br><br>The requirements of this rule aslo include compliance with the requirements of OAC rule 3745-21-09(U)(1)(a)(i). |

**2. Additional Terms and Conditions**

**2.a** The 2.1 lbs VOC/hr emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping or reporting is necessary to ensure compliance with the above limitation.

### II. Operational Restrictions

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

## III. Monitoring and/or Record Keeping Requirements

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

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

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

c. the number of gallons of each coating employed;

d. the total emissions of VOC from each coating employed (b x c), in pounds; and

e. the total emissions of VOC from all the coatings employed (summation of d for all coatings), in pounds.

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

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

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

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

d. the total emissions of VOC from each cleanup material employed (b x c), in pounds; and

e. the total emissions of VOC from all the cleanup materials employed (summation of d for all cleanup materials), in pounds.

**3.** The permittee shall calculate and record the following information each year for this emissions unit:

a. the total VOC emissions from all the coatings employed (the annual VOC emissions shall be calculated by summing the monthly VOC emissions (from section 1.e) for the calendar year, divided by 2000), in tons; and

b. the total VOC emissions from all the cleanup materials employed (the annual VOC emissions shall be calculated by summing the monthly VOC emissions (from section 2.e) for the calendar year, divided by 2000), in tons.

## IV. Reporting Requirements

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

**2.** The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly VOC emission limitation of 166.8 pounds (from cleanup materials). These deviation reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

**3.** The permittee shall submit annual reports that summarize the actual annual VOC emissions from the coatings and cleanup materials employed in this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**4.** The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the emissions unit was in operation. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

## V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation: 3.0 pounds VOC/gallon of coating (excluding water and exempt solvents)

Applicable Compliance Method:
Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

**1.b** Emission Limitation:
2.1 lbs VOC/hr

Applicable Compliance Method:
Compliance with the hourly allowable VOC emission limitation above shall be determined by multiplying the maximum VOC content of all the coatings (lbs/gallon) by the maximum hourly coating usage rate (gallons/hour).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Method 25 or 25A,as appropriate, of 40 CFR, Part 60, Appendix A.

**1.c** Emission Limitations:
166.8 lbs VOC/month, 1.0 ton VOC/year (from cleanup material usage)

Applicable Compliance Method:
Compliance with the monthly and annual allowable VOC emission limitations above shall be based upon the record keeping requirements specified in sections A.III.2 and 3 of this permit.

**1.d** Emission Limitation:
0.30 lb VOC/gallon of coating

Applicable Compliance Method:
Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section A.III.1 of this permit.

**1.e** Emission Limitations:
9.2 tons VOC/year, from coating usage

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in sections A.III.1 and 3 of this permit.

**2.** Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.

## 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 |
|---|---|---|

**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:** LTG Coater C-6 (K011)

**Activity Description:** Lithographic coating operation for sheet metal with oven and Control unit. This is OART Line C-6..

## 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 |
|---|---|---|
| LTG super coater, coating line C-6, with thermal incinerator | OAC rule 3745-21-09 (U)(1) and OAC rule 3745-21-09(B)(6) | The VOC content limitation specified by these rules are less stringent than the limitation established pursuant to OAC rule 3745-31-05. |
| | OAC rule 3745-31-05<br>PTI #03-13250 | 5.36 lbs organic compounds (OC)/hr and 23.5 tons OC/year, from coating usage<br><br>1808 lbs OC/month and 10.9 tons OC/year, from cleanup material usage<br><br>See A.2.b. |

**2. Additional Terms and Conditions**

**2.a** The 5.36 lbs OC/hr emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping or reporting is necessary to ensure compliance with the above limitation.

**2.b** This emissions unit shall be equipped with a thermal incinerator capable of achieving a minimum overall control efficiency of 98% (by weight) for OC.

### II. Operational Restrictions

**1.** The permittee shall operate the thermal incinerator whenever this emissions unit is in operation.

**2.** The average combustion temperature, 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.

## III. Monitoring and/or Record Keeping Requirements

**1.** The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the 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 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 for each day for the control equipment:

a. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the emissions unit was in operation.

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

**2.** The permittee shall maintain daily records that document any time periods when the thermal incinerator was not in service when the emissions unit was in operation.

**3.** The permittee shall collect and record the following information each month for this emissions unit:

a. The company identification for each coating and cleanup material employed.

b. The number of gallons of each coating and cleanup material employed.

c. The OC content of each coating employed, in lbs/gallon, as applied.

d. The OC content of each cleanup material employed, in lbs/gallon.

e. The total OC emission rate from all the coatings employed [summation of ( c X b) for all coatings], in pounds.

f. The total OC emission rate from all the cleanup materials employed [summation of ( d X b) for all cleanup materials], in pounds.

**4.** The permittee shall calculate and record the following information each year for this emissions unit:

a. the total OC emissions from all the coatings employed (the annual OC emissions shall be calculated by summing the monthly OC emissions (from section 3.e) for the calendar year, divided by 2000), in tons; and

b. the total OC emissions from all the cleanup materials employed (the annual OC emissions shall be calculated by summing the monthly OC emissions (from section 3.f) for the calendar year, divided by 2000), in tons.

## IV. Reporting Requirements

**1.** The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.

**2.** The permittee shall submit deviation (excursion) reports that identify all exceedances of the monthly OC emission limitation of 1808 pounds (from cleanup materials).

**3.** The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

**4.** The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the thermal incinerator was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

## IV. Reporting Requirements (continued)

**5.** The permittee shall submit annual reports that summarize the actual annual OC emissions from the coatings and cleanup materials employed in this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**6.** The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the emissions unit was in operation. These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

## V. Testing Requirements

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

**1.a** Emission Limitation:
minimum 98% overall OC reduction, from the coating line

Applicable Compliance Method:
Compliance shall be determined based on the results of emission testing performed in accordance with the methods and procedures specified in section A.V.2 of this permit.

**1.b** Emission Limitations:
5.36 lbs OC/hr, 23.5 tons OC/year (from coating usage)

Applicable Compliance Method:
Compliance with the hourly allowable OC emission limitation shall be determined by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (lbs/gallon).

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements specified in sections A.III.3 and 4 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Method 25 or 25A,as appropriate, of 40 CFR, Part 60, Appendix A.

**1.c** Emission Limitations:
1808 lbs OC/month and 10.9 tons OC/year (from cleanup material usage)

Applicable Compliance Method:
Compliance with the monthly and annual allowable OC emission limitations above shall be based upon the record keeping requirements specified in sections A.III.3 and 4 of this permit.

**2.** Within 3 months following the issuance of this permit and within six months prior to permit expiration, the permittee shall conduct, or have conducted, performance testing for this emissions unit in order 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 thermal incinerator. 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. The destruction efficiency 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. The test method selected shall be based on a consideration of the diversity of organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. The test(s) shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

## V. Testing Requirements (continued)

**3.** Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification. 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notificaiton for review and approval prior to the tests may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission tests.

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 assure that the emissions unit operation and testing procedures provide a valid characterization of the emissions from the emissions unit and/or 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.

**4.** Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials employed.

## 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 |
|---|---|---|
| LTG super coater C-6, with thermal incinerator | none | none |

**2. Additional Terms and Conditions**

**None**

### II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

**1.** The permit to install for this emissions unit (K011) was evaluated based on the actual materials (coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Isophorone
TLV (ug/m3): 21,000
Maximum Hourly Emission Rate (lbs/hr): 0.653
Predicted 1-hour maximum Ground-Level Concentration (ug/m3): 38
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3) : 500

Pollutant: MIK
TLV (ug/m3): 205,000
Maximum Hourly Emission Rate (lbs/hr): 0.302
Predicted 1-hour maximum Ground-Level Concentration (ug/m3): 18
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3) : 4,881

Pollutant: Ethylene Glycol, Monobutyl Ether
TLV (ug/m3): 121,000
Maximum Hourly Emission Rate (lbs/hr): 0.667
Predicted 1-hour maximum Ground-Level Concentration (ug/m3): 39
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3) : 2,881

Pollutant: Mineral Spirits
TLV (ug/m3): 525,000
Maximum Hourly Emission Rate (lbs/hr): 0.253
Predicted 1-hour maximum Ground-Level Concentration (ug/m3): 15
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3) : 12,500

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

**2.** Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

**3.** The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## IV. Reporting Requirements

**None**

## V. Testing Requirements

**None**

## VI. Miscellaneous Requirements

**None**

**********

## THIS IS THE LAST PAGE OF THE PERMIT

**********