PUBLIC NOTICE OF ISSUANCE OF DRAFT REOPENING A TITLE V OPERATING PERMIT FOR Whirlpool Findlay Division (FACILITY ID 03-32-01-0170)

On 01/24/03, the Director of the Ohio Environmental Protection Agency issued a draft action of a reopening of a previously issued Final Title V permit for Whirlpool Findlay Division, located at 4901 North Main Street
Findlay, OH 45840, Ohio.

Comments concerning the draft changes associated with this reopening or a request for a public hearing must be sent in writing to the following address no later than thirty (30) days from the date this notice is published:

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

All inquiries concerning this draft action may be directed to the Air Permit Supervisor ((419) 352-8461). Please indicate that the inquiry concerns a draft Title V action along with the draft action date and the company name identified in this notice.

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

01/24/03

CERTIFIED MAIL

RE: Draft Reopening of OAC Chapter 3745-77 Title V permit

03-32-01-0170
Whirlpool Findlay Division
George D. Crosby
4901 North Main Street
Findlay, OH 45840

Dear George D. Crosby:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft reopening of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. Comments are limited to the changes indicated in the reopening summary and changes to the General Terms and Conditions, if any, from the previous final issued permit. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northwest District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit reopening will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed version of Title V permit reopening and an opportunity to comment prior to the Proposed version of the Title V permit reopening submittal to USEPA.

If you have any questions or comments concerning this draft Title V permit reopening, please contact Northwest District Office.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

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

Whirlpool Findlay Division 03-32-01-0170

Modification Type: OAC rule 3745-77-08(D) Reopening

Summary
The Title V permit issued to Whirlpool Findlay Division is being reopened pursuant to OAC rule 3745-77-08(D)(1)(c) in order to incorporate insignificant emissions units and one significant emissions unit (K011) that were not contained in the previously issued Final permit. Additionally, Ohio EPA is submitting minor modification and administrative changes to certain terms and conditions contained in this permit. All changes, except those to the General Terms and Conditions, if applicable, are identified below.

Description of Changes

Part II.

Section B.1: *The following emissions units were added to the insignificant list:*

automatic dryer, emissions unit Z021;
7.53 mmBtu/hr, natural gas-fired boiler, emissions unit Z022;
7.53 mmBtu/hr, natural gas-fired boiler, emissions unit Z023;
7.53 mmBtu/hr, natural gas-fired boiler, emissions unit Z024;
7.53 mmBtu/hr, natural gas-fired boiler, emissions unit Z025;
7.53 mmBtu/hr, natural gas-fired boiler, emissions unit Z026; and
7.53 mmBtu/hr, natural gas-fired boiler, emissions unit Z027.

Part III.

Emissions unit B003

Section A.I.1: *OAC rules 3745-21-08(B), 3745-23-06(B), and 3745-18-06((A) were added to the applicable rules*

Section A.I.2: *Paragraphs a and b were added.*

Emissions unit K007

Section A.I.1: *OAC rule was added to the applicable rules.*

Section A.I.2.d: The following sentence was added; "(This control efficiency requirement is less stringent than the control requirement required by 40 CFR, Part 60, Subpart SS.)

Section A.I.2.f: *This section is a new addition.*

Section A.III.5: *This section is a new addition.*

Section A.V.1.b: *This section was revised to require that emission testing be conducted to demonstrate compliance with the 0.9 kg/liter of applied solids and not with the 82.2% OC destruction efficiency for the thermal incinerator.*

Section VI.1. *This section was revised to include the schedule for achieving compliance with the limitation established pursuant to 40 CFR, Part 60, Subpart SS and with 3745-31-02 to address the failure to cite 40 CFR, Part 60, Subpart SS in PTI # 03-3658.*

Emissions unit K008.

Same revisions as emissions unit K007.

Emissions unit K011.

This emissions unit is a new addition.

State of Ohio Environmental Protection Agency

DRAFT TITLE V REOPENING PERMIT MODIFICATION

Original Effective Date:	Expiration Date:	Modification Effective Date:
04/17/02	**04/17/07**	***To be entered upon final issuance***

This document constitutes issuance of a Title V significant permit modification for Facility ID: 03-32-01-0170 to:

Whirlpool Findlay Division
4901 North Main Street
Findlay, OH 45840

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

B003 (Paint System Air Makeup)
Air makeup for paint system.

K003 (Electrocoat Prime Coat and Ransburg Finish Paint System)
Cathodic E-coat is applied to steel parts, which are dried in the Prime E-Coat Paint Oven. In the Reinforce Paint Booth, finish paint is applied to prime-coated steel parts in specific areas requiring additional finish paint coverage. Finish paint is then applied to reinforced, prime-coated steel parts by the Ransburg applicators. Parts coated with finish paint are dried in the Finish Paint Oven.

K007 (East Dishrack Powder Coating Line)
Dishracks are preheated in the preheat oven, coated with MEK and adhesion enhancer, dipped into the fluidized bed of powder coating, and cured in the postcure oven.

K008 (West Dishrack Powder Coating Line)
Dishracks are preheated in the preheat oven, coated with MEK and adhesion enhancer, dipped into the fluidized bed of powder coating, and cured in the postcure oven.

K011 (North end SS shear coater)
Coating is applied to stainless steel to prevent scratching during forming

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 3745-77-08(E) 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 Record Keeping 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

(a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (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. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) ,(ii) and (iii))

(b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))

iii. **For monitoring, record keeping, and reporting requirements:**
Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, record keeping, 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.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

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 of any emissions unit(s) 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 OAC rule 3745-15-06, 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).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

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.
(Authority for term: OAC rule 3745-77-07(A)(4))

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.
(Authority for term: OAC rule 3745-77-07(A)(5))

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.
(Authority for term: OAC rule 3745-77-07(A)(6))

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, in accordance with A.10 below. 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

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.
(Authority for term: OAC rule 3745-77-07(A)(8))

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.
(Authority for term: OAC rule 3745-77-07(A)(9))

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.
(Authority for term: OAC rule 3745-77-07(A)(10))

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 (18) 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.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

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.
(Authority for term: OAC rule 3745-77-07(B))

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 Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA 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.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

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.

(Authority for term: OAC rule 3745-77-07(F))

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).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

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.

(Authority for term: OAC rule 3745-77-07(G))

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 of the U.S. EPA, 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.

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 purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)
(Authority for term: OAC rule 3745-77-07(I))

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.
(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. 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.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.
(Authority for term: OAC rule 3745-77-07(A)(1))

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

2. 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.

3. 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.

4. 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).

5. 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.

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

None

B. State Only Enforceable Section

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

tub mastic operation, emissions unit K009;
door mastic operation, emissions unit K010;
cryogenic paint hook stripper, emissions unit P010;
paint mix room, emissions unit Z002;
paint removal sanding booth, emissions unit Z003;
maintenance painting operation, emissions unit Z004;
general machining, emissions unit Z005;
plastic presses, emissions unit Z006;
plastic regrind, emissions unit Z007;
assembly carton sealers, emissions unit Z008;
assembly fiberglass insulation application, emissions unit Z009;
back-up generator, emissions unit Z010;
maintenance parts washer, emissions unit Z011;
miscellaneous air make-up units, emissions unit Z015;
wastewater pretreatment plant, emissions unit Z016;
hazardous waste building activities, emissions unit Z017;
unpaved roads and parking areas, emissions unit Z018;
pyro testing room, emissions unit Z019;
distribution center, emissions unit Z020;
automatic dryer, emissions unit Z021;
7.53 mmBtu/hr, natural gas-fired boiler, emissions unit Z022;
7.53 mmBtu/hr, natural gas-fired boiler, emissions unit Z023;
7.53 mmBtu/hr, natural gas-fired boiler, emissions unit Z024;
7.53 mmBtu/hr, natural gas-fired boiler, emissions unit Z025;
7.53 mmBtu/hr, natural gas-fired boiler, emissions unit Z026; and
7.53 mmBtu/hr, natural gas-fired boiler, emissions unit Z027.

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 (PTI) for the emissions unit.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

Emissions Unit ID: Paint System Air Makeup (B003)
Activity Description: Air makeup for paint system.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
12.4 mmBtu/hr, natural gas-fired air make-up system, with liquified petroleum gas (LPG) as back-up fuel	OAC rule 3745-17-10(B)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.a.
	OAC rule 3745-18-06(A)	See A.I.2.b.
	OAC rule 3745-31-05 (PTI 03-9387)	0.44 lb carbon monoxide (CO)/hr, 1.93 tons/yr CO 2.09 lbs nitrogen oxides (NOx)/hr, 9.15 tons/yr NOx 0.25 lb PE/hr, 1.10 tons/yr PE The requirements of this rule also include compliance with the requirements of OAC rules 3745-18-06(A), 3745-17-07(A), 3745-17-(10)(B), 3745-21-08(B) and 3745-23-06(B).

2. Additional Terms and Conditions

a. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install # 03-9387.

b. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas/LPG as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas/LPG being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas/LPG being burned in this emissions unit is the standard, pipeline quality natural gas/LPG supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

II Operational Restrictions

1. The permittee shall burn only natural gas and/or LPG in this emissions unit.

III Monitoring and/or Recordkeeping

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

1a. Emission Limitations: 0.25 lb PE/hr, 1.10 tons/yr PE

Applicable Compliance Method:
When combusting natural gas, the permittee may demonstrate compliance with the hourly allowable PE limitation by multiplying the maximum hourly natural gas consumption rate (.0118 mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft.

When combusting LPG, the permittee may demonstrate compliance with the hourly allowable PE limitation by multiplying the maximum hourly LPG consumption rate (132 gallons/hr) by the emission factor from AP-42, Table 1.5-1 (revised 10/96) of 0.6 lb PE (filterable)/1000 gallons.

Compliance with the annual allowable PE limitation shall be ensured if compliance with the hourly allowable PE limitation is maintained (the annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5.

1b. Emission Limitation: 0.020 pound PE/mmBtu of actual heat input

Applicable Compliance Method:
When combusting natural gas, the permittee may demonstrate compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (.0118 mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (12.4 mmBtu/hr).

When combusting LPG, the permittee may demonstrate compliance with the hourly allowable PE limitation by multiplying the maximum hourly LPG consumption rate (132 gallons/hr) by the emission factor from AP-42, Table 1.5-1 (revised 10/96) of 0.6 lb PE (filterable)/1000 gallons, and then dividing by the maximum heat input capacity of the boiler (12.4 mmBtu/hr).

If required, compliance with the lb PE/mmBtu allowable emission limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

1c. Emission Limitations: 0.44 lb CO/hr, 1.93 tons/yr CO

Applicable Compliance Method:
When combusting natural gas, the permittee may demonstrate compliance with the hourly allowable CO limitation by multiplying the maximum hourly natural gas consumption rate (.0118 mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-1 (revised 7/98) of 84 lbs CO/mm cu. ft.

When combusting LPG, the permittee may demonstrate compliance with the hourly allowable CO emission limitation by multiplying the maximum hourly LPG consumption rate (132 gallons/hr) by the emission factor from AP-42, Table 1.5-1 (revised 10/96) of 3.6 lbs CO/1000 gallons.

Compliance with the annual allowable CO limitation shall be ensured if compliance with the hourly allowable CO limitation is maintained (the annual allowable CO limitation was developed by multiplying the hourly allowable CO limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable CO limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 10.

1d. Emission Limitations: 2.09 lbs NOx/hr, 9.15 tons/yr NOx

Applicable Compliance Method:
When combusting natural gas, the permittee may demonstrate compliance with the hourly allowable NOx limitation by multiplying the maximum hourly natural gas consumption rate (.0118 mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-1 (revised 7/98) of 100 lbs NOx/mm cu. ft.

When combusting LPG, the permittee may demonstrate compliance with the hourly allowable NOx emission limitation by multiplying the maximum hourly LPG consumption rate (132 gallons/hr) by the emission factor from AP-42, Table 1.5-1 (revised 10/96) of 21 lbs NOx/1000 gallons.

Compliance with the annual allowable NOx limitation shall be ensured if compliance with the hourly allowable NOx limitation is maintained (the annual allowable NOx limitation was developed by multiplying the hourly allowable NOx limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly allowable NOx limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 7.

1e. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance with the visible particulate emissions limitations shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

VI Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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 Recordkeeping
None

IV Reporting Requirements
None

V Testing Requirements
None

VI Miscellaneous Requirements
None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

Emissions Unit ID: Electrocoat Prime Coat and Ransburg Finish Paint System (K003)

Activity Description: Cathodic E-coat is applied to steel parts, which are dried in the Prime E-Coat Paint Oven. In the Reinforce Paint Booth, finish paint is applied to prime-coated steel parts in specific areas requiring additional finish paint coverage. Finish paint is then applied to reinforced, prime-coated steel parts by the Ransburg applicators. Parts coated with finish paint are dried in the Finish Paint Oven.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
large appliance coating line, with 7.1 mmBtu/hr prime e-coat curing oven, manual spray gun and booth (w/ water wall), rotary disk paint applicators (w/ fiberglass filters), and 7 mmBtu/hr finish paint curing oven	OAC rule 3745-21-09(K)(1)	exempt, pursuant to OAC rule 3745-21-09(K)(4) [See A.I.2.a.]
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-17-07(A)	none (See A.I.2.c.)

2. Additional Terms and Conditions

a. This emissions unit was installed prior to October 19, 1979 and is located at the "Whirlpool Corporation (Findlay Division)." Therefore, in accordance with OAC rule 3745-21-09(K)(4), the provisions of OAC rule 3745-21-09(K)(1) are not applicable to this emissions unit as long as a "modification" to this emissions unit does not occur.

b. The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Hancock County.

c. The emissions unit is exempt from the visible particulate emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

None

IV Reporting Requirements

None

V Testing Requirements

None

VI Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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 Recordkeeping
None

IV Reporting Requirements
None

V Testing Requirements
None

VI Miscellaneous Requirements
None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

Emissions Unit ID: East Dishrack Powder Coating Line (K007)
Activity Description: Dishracks are preheated in the preheat oven, coated with MEK and adhesion enhancer, dipped into the fluidized bed of powder coating, and cured in the postcure oven.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
east dishrack powder coating line, with thermal incinerator and cyclonic wet scrubber	OAC rule 3745-21-09(K)(1) OAC rule 3745-21-09(B)(6)	See A.I.2.c.
	OAC rule 3745-17-11(A)	none (See A.I.2.a.)
	OAC rule 3745-17-07(A)	none (See A.I.2.b.)
	40 CFR, Part 60, Subpart SS	0.90 kg VOC/liter of applied coating solids, based on a monthly, volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (See A.VI.1.)
	OAC rule 3745-31-05(A)(3) (PTI# 03-3658)	0.44 lb VOC/gallon of coating (after controls) [See A.I.2.f.] 0.024 lb particulate emissions (PE)/hr See A.I.2.d and A.I.2.e.

	The requirements of this rule also include compliance with the requirements of 40 CFR, Part 60, Subpart SS.

2. Additional Terms and Conditions

a. The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Hancock County.

b. The emissions unit is exempt from the visible particulate emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

c. The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to 40 CFR, Part 60, Subpart SS.

d. The VOC emissions from this emissions unit shall be controlled through the use of a thermal oxidizer with a minimum overall control efficiency of 80.2%, by weight, for VOCs. (This control efficiency requirement is less stringent than the control requirement required by 40 CFR, Part 60, Subpart SS.)

e. The permittee shall control all the PE from this emissions unit with a cyclonic wet scrubber.

f. The 0.44 lb VOC/gallon of coating limitation established pursuant to OAC rule 3745-31-05(A) is less stringent than the VOC emission limitation specified by 40 CFR, Part 60, Subpart SS for the adhesion promoter. The powder coatings employed shall comply with the 0.44 lb VOC/gallon of coating limitation.

II Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, 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.

2. The coatings usage in this emissions unit shall not exceed 185,598 gallons per rolling, 12-month period.

3. The pressure drop across the scrubber (in inches of water), while the emissions unit is in operation, shall be continuously maintained within the range recommended by the manufacturer of the equipment until

such time when a range shall be established during emission testing demonstrating that the emissions unit is in compliance.

III Monitoring and/or Recordkeeping

1. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer 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 control equipment:

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

   b. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, 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. Each month, the permittee shall determine the monthly, volume-weighted average of the total mass of VOCs emitted to the atmosphere per volume of applied adhesion promoter coating solids, in kilograms per liter, calculated as follows:

   a. Calculate the mass of VOCs consumed (Mo+Md) during the calendar month by the following equation:

      Mo+Md = [summation of (Lci X Dci X Woi) for i = 1,2, ...,n + summation of (Ldj X Ddj) for j = 1,2,...,m]

      where:

      Mo = the total VOC emissions, in kilograms, from all the coatings consumed, as received

      Md = the total VOC emissions, in kilograms, from all the solvents added to the coatings

      Lci = the total volume, in liters, of coating i consumed, as received

      Ldj = the total volume, in liters, of solvent j added to coatings

Dci = density of coating i, as received (kilograms per liter)

Ddj = density of solvent j added to coatings (kilograms per liter)

Woi = the fraction, by weight, of the VOCs in coating i, as received

n = the number of different coatings used during the calendar month

m = the number of different solvents added to coatings during the caledar month

b. Calculate the total volume of coatings solids used (Ls) in the calendar month by the following equation:

Ls = summation of (Lci X Vsi) for i = 1, 2, ..., n

where:

Ls = the volume of all the coatings solids consumed (liters)

Lci = the volume of coating i consumed, as received (liters)

Vsi = the fraction, by volume, of the solids in coating i, as received

n = the number of different coatings used during the calendar month

Calculate the volume-weighted average mass of VOCs consumed per unit volume of coating solids applied during the calendar month by the following equation:

N = [(Mo+Md) x (1 - R)/(Ls x T)

where:

N = the volume-weighted average mass of VOCs in coatings emitted to the atmosphere in a calendar month per unit volume of applied coating solids (kilograms per liter)

R = the overall control efficiency for VOCs (as a fraction), as determined during the most recent emission testing that demonstrated the emissions unit was in compliance

T = the transfer efficiency (fraction)

3. The permittee shall properly operate and maintain equipment to continuously monitor and record the pressure drop across the scrubber, in inches of water, while the emissions unit is in operation. The

monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

a. The pressure drop across the scrubber, in inches of water, on a once/shift basis.

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

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

a. The name and identification number of each coating employed.

b. The number of gallons of each coating employed.

c. The total number of gallons of all the coatings employed (summation of 4.b for all coatings).

d. The rolling, 12-month summation of the monthly coating usage rates.

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

a. The name and identification number of each powder coating employed.

b. The VOC content, in pounds per gallon, of each powder coating employed.

IV Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the VOC emission limitation of 0.9 kg VOC/liter of coating solids (based on a monthly, volume-weighted average).

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, 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;

b. all exceedances of the rolling, 12-month coatings usage restriction of 185,598 gallons; and

c. all periods of time during which the pressure drop across the scrubber did not comply with the pressure drop requirements specified above.

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 associated emissions unit was in operation.

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

5. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any noncomplying powder coating [i.e., for VOC content (pounds of VOC per gallon of powder coating)] in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the exceedance occurs.

V Testing Requirements

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

1a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration, and shall be conducted in accordance with the compliance schedule in section A.VI.1 of this permit.

1b. The emission testing shall be conducted to demonstrate compliance with the VOC emission limitation of 0.90 kg/liter of applied coating solids, and shall include a determination of the overall VOC reduction efficiency of the thermal oxidizer.

1c. The following test method(s) shall be employed to determine the overall control efficiency for the thermal oxidizer. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

1d. The overall VOC emission reduction efficiency (R) of the thermal oxidizer shall be determined in accordance with 40 CFR 60.453(b)(2)9i), where R = E x F.

The capture efficiency (F) 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 destruction efficiency of the thermal oxidizer (E) shall be determined 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 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.

1e. The test(s) shall be conducted while this emissions unit and emissions unit K008 are operating at their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

1f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northwest District Office 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office 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 Ohio EPA, Northwest District Office.

2. During any emission testing for this emissions unit, the permittee shall record the following additional information:

   a. the combustion temperature within the thermal incinerator, as a 3-hour average, in degrees Fahrenheit; and

   b. the pressure drop range for the scrubber, in inches of water.

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

3a. Emission Limitation: 0.90 kg VOC/liter of applied coating solids (based on a monthly, volume-weighted average)

Applicable Compliance Method: Compliance with the lbs VOC/gallon of coating solids limitation above shall be based upon the record keeping required pursuant to Section A.III.2 of this permit.

3b. Emission Limitation: 0.024 lb PE/hr

Applicable Compliance Method:
To calculate the worst case for PE, the permittee may use the following equation:

E = (maximum coating solids usage rate, in pounds per hour) x (1 - TE) x (1 - CE)

where:

E = PE rate (lbs/hr)

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

CE = control efficiency of the control equipment

If required, compliance with the hourly allowable PE limitation shall be determined pursuant to Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

3c. Emission Limitation: 0.44 lb VOC/gallon of coating (for powder coatings)

Applicable Compliance Method: Compliance with the lbs VOC/gallon of coating VOC content limitation above shall be based upon the record keeping required pursuant to Section A.III.5 of this permit.

4. USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials. If pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

VI Miscellaneous Requirements

1. Schedule for achieving compliance with 40 CFR, Part 60, Subpart SS:

Within one month after the issuance of this permit, the permittee shall cease using methyl ethyl ketone (MEK) as a dilution solvent for the dishwasher rack adhesion promoter (rack primer) and switch to acetone or an alternative adhesion promoter coating for emissions units K007 and K008. [The requirements of OAC rule 3745-21-09(B)(6) shall continue to be met at all times until final compliance is achieved.] Subsequent to this change of coating, the permittee shall have sixty days to evaluate the use of acetone or an alternative adhesion promoter coating. If, based on the sixty-day trial period, the acetone or alternative adhesion promoter coating is not acceptable to the permittee, the permittee shall revert back to the use of MEK solvent and implement the following compliance plan and time schedule for the installation of enhanced control equipment:

a. Evaluate control alternatives*

b. Solicit bids*

c. Evaluate bids*

d. Select vendor*

e. Start on-site construction (within 120 days after completion of d)

f. Finish on-site construction (within 60 days after completion of e)

g. Start-up/troubleshoot/test system to demonstrate final compliance (within 60 days after completion of f)

* The permittee shall complete milestones a through d above within 90 days after the end of the trial period.

Schedule for achieving compliance with OAC rule 3745-31-02:

Once the control equipment is selected, the permittee shall submit a permit to install modification application reflecting the changes within 30 days thereafter to address the failure to cite 40 CFR, Part 60, Subpart SS in PTI # 03-3658.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
east dishrack powder coating line, with thermal incinerator and cyclonic wet scrubber	None	None

2. Additional Terms and Conditions

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

1. The permit to install for this permit action as 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: methyl ethyl ketone
TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 7.4
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 64.95
AGLC (ug/m3): 14,047

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:

2a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

2b. 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

2c. 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:"

3a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

3b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

3c. 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

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

Emissions Unit ID: West Dishrack Powder Coating Line (K008)
Activity Description: Dishracks are preheated in the preheat oven, coated with MEK and adhesion enhancer, dipped into the fluidized bed of powder coating, and cured in the postcure oven.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
west dishrack powder coating line, with thermal incinerator and cyclonic wet scrubber	OAC rule 3745-21-09(K)(1) OAC rule 3745-21-09(B)(6)	See A.I.2.c.
	OAC rule 3745-17-11(A)	none (See A.I.2.a.)
	OAC rule 3745-17-07(A)	none (See A.I.2.b.)
	40 CFR, Part 60, Subpart SS	0.90 kg VOC/liter of applied coating solids, based on a monthly, volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (See A.VI.1.)
	OAC rule 3745-31-05(A)(3) (PTI# 03-3658)	0.44 lb VOC/gallon of coating (after controls) [See A.I.2.f.] 0.024 lb particulate emissions (PE)/hr See A.I.2.d and A.I.2.e. The requirements of this rule also include compliance with the requirements of 40 CFR, Part 60, Subpart SS.

2. Additional Terms and Conditions

a. The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Hancock County.

b. The emissions unit is exempt from the visible particulate emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

c. The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to 40 CFR, Part 60, Subpart SS.

d. The VOC emissions from this emissions unit shall be controlled through the use of a thermal oxidizer with a minimum overall control efficiency of 80.2%, by weight, for VOCs. (This control efficiency requirement is less stringent than the control requirement required by 40 CFR, Part 60, Subpart SS.)

e. The permittee shall control all the PE from this emissions unit with a cyclonic wet scrubber.

f. The 0.44 lb VOC/gallon of coating limitation established pursuant to OAC rule 3745-31-05(A) is less stringent than the VOC emission limitation specified by 40 CFR, Part 60, Subpart SS for the adhesion promoter. The powder coatings employed shall comply with the 0.44 lb VOC/gallon of coating limitation.

II Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, 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.

2. The coatings usage in this emissions unit shall not exceed 185,598 gallons per rolling, 12-month period.

3. The pressure drop across the scrubber (in inches of water), while the emissions unit is in operation, shall be continuously maintained within the range recommended by the manufacturer of the equipment until such time when a range shall be established during emission testing demonstrating that the emissions unit is in compliance.

III Monitoring and/or Recordkeeping

1. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer 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 control equipment:

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

   b. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, 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. Each month, the permittee shall determine the monthly, volume-weighted average of the total mass of VOCs emitted to the atmosphere per volume of applied adhesion promoter coating solids, in kilograms per liter, calculated as follows:

   a. Calculate the mass of VOCs consumed (Mo+Md) during the calendar month by the following equation:

      Mo+Md = [summation of (Lci X Dci X Woi) for i = 1,2, ...,n + summation of (Ldj X Ddj) for j = 1,2,...,m]

      where:

      Mo = the total VOC emissions, in kilograms, from all the coatings consumed, as received

      Md = the total VOC emissions, in kilograms, from all the solvents added to the coatings

      Lci = the total volume, in liters, of coating i consumed, as received

      Ldj = the total volume, in liters, of solvent j added to coatings

      Dci = density of coating i, as received (kilograms per liter)

      Ddj = density of solvent j added to coatings (kilograms per liter)

Woi = the fraction, by weight, of the VOCs in coating i, as received

n = the number of different coatings used during the calendar month

m = the number of different solvents added to coatings during the caledar month

b. Calculate the total volume of coatings solids used (Ls) in the calendar month by the following equation:

Ls = summation of (Lci X Vsi) for i = 1, 2, ..., n

where:

Ls = the volume of all the coatings solids consumed (liters)

Lci = the volume of coating i consumed, as received (liters)

Vsi = the fraction, by volume, of the solids in coating i, as received

n = the number of different coatings used during the calendar month

Calculate the volume-weighted average mass of VOCs consumed per unit volume of coating solids applied during the calendar month by the following equation:

$N = [(Mo+Md) \times (1 - R)/(Ls \times T)$

where:

N = the volume-weighted average mass of VOCs in coatings emitted to the atmosphere in a calendar month per unit volume of applied coating solids (kilograms per liter)

R = the overall control efficiency for VOCs (as a fraction), as determined during the most recent emission testing that demonstrated the emissions unit was in compliance

T = the transfer efficiency (fraction)

3. The permittee shall properly operate and maintain equipment to continuously monitor and record the pressure drop across the scrubber, in inches of water, while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

a. The pressure drop across the scrubber, in inches of water, on a once/shift basis.

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

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

a. The name and identification number of each coating employed.

b. The number of gallons of each coating employed.

c. The total number of gallons of all the coatings employed (summation of 4.b for all coatings).

d. The rolling, 12-month summation of the monthly coating usage rates.

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

a. The name and identification number of each powder coating employed.

b. The VOC content, in pounds per gallon, of each powder coating employed.

IV Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the VOC emission limitation of 0.9 kg VOC/liter of coating solids (based on a monthly, volume-weighted average).

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, 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;

b. all exceedances of the rolling, 12-month coatings usage restriction of 185,598 gallons; and

c. all periods of time during which the pressure drop across the scrubber did not comply with the pressure drop requirements specified above.

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 associated emissions unit was in operation.

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

5. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any monthly record showing the use of any noncomplying powder coating [i.e., for VOC content (pounds of VOC per gallon of powder coating)] in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the exceedance occurs.

V Testing Requirements

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

1a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration, and shall be conducted in accordance with the compliance schedule in section A.VI.1 of this permit.

1b. The emission testing shall be conducted to demonstrate compliance with the VOC emission limitation of 0.90 kg/liter of applied coating solids, and shall include a determination of the overall VOC reduction efficiency of the thermal oxidizer.

1c. The following test method(s) shall be employed to determine the overall control efficiency for the thermal oxidizer. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

1d. The overall VOC emission reduction efficiency (R) of the thermal oxidizer shall be determined in accordance with 40 CFR 60.453(b)(2)9i), where R = E x F.

The capture efficiency (F) 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 destruction efficiency of the thermal oxidizer (E) shall be determined 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 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.

1e. The test(s) shall be conducted while this emissions unit and emissions unit K008 are operating at their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

1f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northwest District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Northwest District Office 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office 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 Ohio EPA, Northwest District Office.

2. During any emission testing for this emissions unit, the permittee shall record the following additional information:

   a. the combustion temperature within the thermal incinerator, as a 3-hour average, in degrees Fahrenheit; and

   b. the pressure drop range for the scrubber, in inches of water.

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

3a. Emission Limitation: 0.90 kg VOC/liter of applied coating solids (based on a monthly, volume-weighted average)

Applicable Compliance Method: Compliance with the lbs VOC/gallon of coating solids limitation above shall be based upon the record keeping required pursuant to Section A.III.2 of this permit.

3b. Emission Limitation: 0.024 lb PE/hr

Applicable Compliance Method:
To calculate the worst case for PE, the permittee may use the following equation:

E = (maximum coating solids usage rate, in pounds per hour) x (1 - TE) x (1 - CE)

where:

E = PE rate (lbs/hr)

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

CE = control efficiency of the control equipment

If required, compliance with the hourly allowable PE limitation shall be determined pursuant to Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

3c. Emission Limitation: 0.44 lb VOC/gallon of coating (for powder coatings)

Applicable Compliance Method: Compliance with the lbs VOC/gallon of coating VOC content limitation above shall be based upon the record keeping required pursuant to Section A.III.5 of this permit.

4. USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials. If pursuant to section 4.3 of Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

VI Miscellaneous Requirements

1. Schedule for achieving compliance with 40 CFR, Part 60, Subpart SS:

Within one month after the issuance of this permit, the permittee shall cease using methyl ethyl ketone (MEK) as a dilution solvent for the dishwasher rack adhesion promoter (rack primer) and switch to acetone or an alternative adhesion promoter coating for emissions units K007 and K008. [The requirements of OAC rule 3745-21-09(B)(6) shall continue to be met at all times until final compliance is achieved.] Subsequent to this change of coating, the permittee shall have sixty days to evaluate the use of acetone or an alternative adhesion promoter coating. If, based on the sixty-day trial period, the acetone or alternative adhesion promoter coating is not acceptable to the permittee, the permittee shall revert back to the use of MEK solvent and implement the following compliance plan and time schedule for the installation of enhanced control equipment:

a. Evaluate control alternatives*

b. Solicit bids*

c. Evaluate bids*

d. Select vendor*

e. Start on-site construction (within 120 days after completion of d)

f. Finish on-site construction (within 60 days after completion of e)

g. Start-up/troubleshoot/test system to demonstrate final compliance (within 60 days after completion of f)

* The permittee shall complete milestones a through d above within 90 days after the end of the trial period.

Schedule for achieving compliance with OAC rule 3745-31-02:

Once the control equipment is selected, the permittee shall submit a permit to install modification application reflecting the changes within 30 days thereafter to address the failure to cite 40 CFR, Part 60, Subpart SS in PTI # 03-3658.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
west dishrack powder coating line, with thermal incinerator and cyclonic wet scrubber	None	None

2. Additional Terms and Conditions

None

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

1. The permit to install for this permit action as 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: methyl ethyl ketone
TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 7.4
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 64.95
AGLC (ug/m3): 14,047

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:

2a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

2b. 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

2c. 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:"

3a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

3b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

3c. 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

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

Emissions Unit ID: North end SS shear coater (K011)
Activity Description: Coating is applied to stainless steel to prevent scratching during forming

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
metal coil surface coating	OAC rule 3745-31-05(A)(3) PTI 03-13441	3.16 lbs volatile organic compounds (VOC)/hr, 13.85 tons VOC/yr The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart TT.
	OAC rule 3745-21-09(E)	See A.I.2.a.
	40 CFR Part 60, Subpart TT	0.28 kilogram VOC per liter of coating solids applied, as a monthly, volume-weighted average

2. Additional Terms and Conditions

a. The VOC content limitation established by this rule is less stringent than the VOC content limitation established pursuant to 40 CFR Part 60, Subpart TT.

b. The hourly VOC emission limitation is based on the emissions unit's potential to emit. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

II Operational Restrictions

None

III Monitoring and/or Recordkeeping

1. The permittee shall collect and record the following information each month for the line:

   a. the name and identification number of each coating, as applied;

   b. the VOC content of each coating, in pounds/gallon, as applied;

   c. the number of gallons of each coating employed; and

   d. the total VOC emission rate for all the coatings, in pounds (summation of (b x c) for all coatings).

2. Each month, the permittee shall determine the monthly, volume-weighted average of the total mass of VOCs emitted to the atmosphere per volume of applied coating solids, in kilograms per liter, calculated as follows:

   a. Calculate the mass of VOCs consumed (Mo+Md) during the calendar month by the following equation:

      Mo+Md = [summation of (Lci X Dci X Woi) for i = 1,2, ...,n + summation of (Ldj X Ddj) for j = 1,2,...,m]

      where:

      Mo = the total VOC emissions, in kilograms, from all the coatings consumed, as received

      Md = the total VOC emissions, in kilograms, from all the solvents added to the coatings

      Lci = the total volume, in liters, of coating i consumed, as received

      Ldj = the total volume, in liters, of solvent j added to coatings

      Dci = density of coating i, as received (kilograms per liter)

      Ddj = density of solvent j added to coatings (kilograms per liter)

      Woi = the fraction, by weight, of the VOCs in coating i, as received

n = the number of different coatings used during the calendar month

m = the number of different solvents added to coatings during the caledar month

b. Calculate the total volume of coatings solids used (Ls) in the calendar month by the following equation:

Ls = summation of (Lci X Vsi) for i = 1, 2, ..., n

where:

Ls = the volume of all the coatings solids consumed (liters)

Lci = the volume of coating i consumed, as received (liters)

Vsi = the fraction, by volume, of the solids in coating i, as received

n = the number of different coatings used during the calendar month

Calculate the volume-weighted average mass of VOCs consumed per unit volume of coating solids applied during the calendar month by the following equation:

G = (Mo+Md)/(Ls X T)

where:

G = the volume-weighted average mass of VOCs in coatings consumed in a calendar month per unit volume of applied coating solids (kilograms per liter)

T = transfer efficiency (0.90)

2. If each individual coating used by an affected facility has a VOC content , as received, that is equal to or less than 0.28 kg/liter of coating solids, the affected facility is in compliance provided no VOC's are added to the coatings during distribution or application.

IV Reporting Requirements

1. The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

2. The permittee shall identify, record, and submit a written report to the Ohio EPA every calendar quarter of each instance in which the monthly, volume-weighted average of the local mass of VOC's

emitted to the atmosphere per volume of applied coating solids is greater than the limitation 2.8 kg/liter of coating solids applied.

V Testing Requirements

1. The permittee shall conduct an initial performance test, as required under 40 CFR Part 60.8(a), and thereafter a performance test for each calendar month according to the procedures in section V.2.

2. The reference method in 40 CFR, Part 60, Appendix A, except as provided under CFR Part 60.8(b), shall be used to determine compliance with 40 CFR, Part 60.462 as follows:

2a. Reference Method 24, or data provided by the formulator of the coating for determining VOC content of each coating as applied to the surface of the metal coil. In the event of a dispute, Reference Method 24 shall be the reference method. When VOC content of waterborne coatings, determined by Reference Method 24, is used to determine compliance of affected facilities, the results of the Reference Method 24 analysis shall be adjusted as described in section 4.4 of Reference Method 24.

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

3a. Emission Limitations: 3.16 lbs VOC/hr, 13.85 TPY VOC

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established by multiplying the maximum VOC content of all the coatings (0.51 pound per gallon) by the maximum usage rate (6.2 gallons/hour).

The record keeping requirements in Section A.III.1 shall be used to determine compliance with the annual allowable VOC limitation and shall be the summation of the monthly VOC emission rates, from section III.1.d, divided by 2000.

3b. Emission Limitation: 0.28 kilogram VOC/liter of coating solids applied (based on a monthly, volume-weighted average)

Applicable Compliance Method: Compliance with the lbs VOC/gallon of coating solids limitation above shall be based upon the record keeping required pursuant to Section A.III.2 of this permit.

VI Miscellaneous Requirements

None

North end SS shear coater (K011)

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
metal coil surface coating	None	None

2. Additional Terms and Conditions
None

II Operational Restrictions
None

III Monitoring and/or Recordkeeping

1. The permit to install for this emissions unit K011 was evaluated based on the actual materials (typically 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: Ammonia
   TLV (mg/m3): 17
   Maximum Hourly Emission Rate (lbs/hr): 1.30
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 54.67
   MAGLC (ug/m3): 405

   Pollutant: Ethanol
   TLV (mg/m3): 1880

Maximum Hourly Emission Rate (lbs/hr): 2.24
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 94.20
MAGLC (ug/m3): 1,880,000

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 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 (typically for coatings and 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 the 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 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