Facility ID: 0125041529 Issuance type: Title V Proposed Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a **State and Federally Enforceable Section**

1. None

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Facility ID: 0125041529 Issuance type: Title V Proposed Permit

b **State Only Enforceable Section**

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

P001- shell washer and drying oven;
P002- lid washer and drying oven;
Z010- stencil/silkscreen area;
Z011- video ink jet stamping;
Z012- lid and bottom seam sealant; and
Z014- drum touch-up.

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

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0125041529 Emissions Unit ID: B001 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
10.0 MMBtu/hr natural gas-fired indoor ambient air space heater	OAC rule 3745-31-05(A)(3) (PTI # 01-6389)	Particulate emissions shall not exceed 0.14 pound per hour and 0.61 ton per year. NOx emissions shall not exceed 1.4 pounds per hour and 6.13 tons per year. Carbon monoxide emissions shall not exceed 0.35 pound per hour and 1.53 tons per year. Sulfur dioxide emissions shall not exceed 0.01 pound per hour and 0.03 ton per year. Organic compound emissions shall not exceed 0.06 pound per hour and 0.25 ton per year.
	OAC rule 3745-17-07 (A)	None, see A.I.2.c below.
	OAC rule 3745-17-11(B)(1)	None, see A.I.2.b below.
	OAC rule 3745-17-10 (B)(1)	None, see A.I.2.a below.
	OAC rule 3745-18-06	None, exempt pursuant to OAC rule 3745-18-06(B).

2. **Additional Terms and Conditions**

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

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

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

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II. **Operational Restrictions**

1. None

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

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

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IV. **Reporting Requirements**

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

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V. **Testing Requirements**

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

a. Emission Limitation: Particulate emissions shall not exceed 0.14 pound per hour and 0.61 ton per year.

Applicable Compliance Method:
Compliance with the emission limitation of 0.14 lb PE/hr may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,000 cu. ft./hr) by the AP-42, Table 1.4-3 emission factor for natural gas of 1.9 lbs PE/mmscf. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

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

b. Emission Limitation: NOx emissions shall not exceed 1.4 pounds per hour and 6.13 tons per year.

Applicable Compliance Method:
Compliance with the emission limitation of 1.4 lbs NOx/hr may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,000 cu. ft./hr) by the AP-42, Table 1.4-1 emission factor for natural gas of 140 lbs NOx/mmscf. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

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

c. Emission Limitation: Carbon monoxide emissions shall not exceed 0.35 pound per hour and 1.53 tons per year.

Applicable Compliance Method:
Compliance with the emission limitation of 0.35 lb CO/hr may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,000 cu. ft./hr) by the AP-42, Table 1.4-1 emission factor for natural gas of 35 lbs CO/mmscf. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

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

d. Emission Limitation: Sulfur dioxide emissions shall not exceed 0.01 pound per hour and 0.03 ton per year.

Applicable Compliance Method:
Compliance with the emission limitation of 0.01 lb SO2/hr may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,000 cu. ft./hr) by the AP-42, Table 1.4-1 emission factor for natural gas of 0.6 lb SO2/mmscf. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C.

e. Emission Limitation: Organic compound emissions shall not exceed 0.06 pound per hour and 0.25 ton per year.

Applicable Compliance Method:
Compliance with the emission limitation of 0.06 lb OC/hr may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (10,000 cu. ft./hr) by the AP-42, Table 1.4-1 emission factor for natural gas of 5.8 lbs OC/mmscf. Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0125041529 Emissions Unit ID: B001 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
10.0 MMBtu/hr natural gas-fired indoor ambient air space heater	none	none

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0125041529 Emissions Unit ID: K001 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
interior drum lining line (two drum lining spray booths and one 4.8 mmBtu/hr baking oven)	OAC rule 3745-31-05(A)(3) (PTI # 01-6362)	Combined emissions from K001-K003 shall not exceed 100.71 tons of volatile organic compounds (VOC) per year. VOC emissions from the application of coatings shall not exceed 64.5 pounds per hour. VOC emissions from the application of coatings and cleanup materials shall not exceed 34.12 tons per year. Combined emissions from K001-K003 shall not exceed 2.0 tons of particulate emissions per year. See A.2.a - A.2.c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11(B)(1) and 3745-21-09(U)(1)(e).
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 6.98 pounds per hour.
	OAC rule 3745-17-07 (A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3475-21-09 (U)(1)(e)	4.3 pounds volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents.

2. **Additional Terms and Conditions**

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

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

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

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

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II. **Operational Restrictions**

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

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

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

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

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

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

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

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

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

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

   g. the total number of hours of operation; and

   h. the average hourly VOC emission rate from the application of coating. i.e., (e/g).

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

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

4. The permittee shall calculate and record the rolling, 12-month summation of the coating usage rates.

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

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

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IV. **Reporting Requirements**

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

2. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days after the event occurs.

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

4. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the rolling, 12-month summation of the coating usage limitation.

   The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

5. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing an exceedance of the monthly gallons usage limitation for n-butyl acetate. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

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

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V. **Testing Requirements**

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

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

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

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

b. Emission Limitation: Combined emissions from K001-K003 shall not exceed 100.71 tons VOC/yr

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

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

Compliance shall be based upon the record keeping requirements specified in sections A.III.1 and A.III.4 of this permit.

d. Emission Limitation: VOC emissions from the application of coatings shall not exceed 64.5 pounds per hour.

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

e. Emission Limitation: VOC emissions from the application of coatings and cleanup materials shall not exceed 34.12 tons per year.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

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

Compliance shall be based upon the record keeping requirements specified in section A.III.6 of this permit.

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

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

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

h. Emission Limitation:
Particulate emissions shall not exceed 6.98 pounds per hour.

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

E = particulate emissions rate (lbs/hr)

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (60% according to 40 CFR 60.453)

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

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

i. mission Limitation: Combined emissions from K001-K003 shall not exceed 2.0 tons of particulate emissions per year.

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

E = particulate emissions rate (tons/yr)

= maximum coating solids usage rate in tons per year (calculated by multiplying the annual coating usage recorded in A.III.4 of this permit by the coating density and then by the weight % solids of the coating) X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (60% according to 40 CFR 60.453)

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

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

2. Emission Limitation: Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0125041529 Emissions Unit ID: K001 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
interior drum lining line (two drum lining spray booths and one 4.8 mmBtu/hr baking oven)		

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit was evaluated based on the actual 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: Toluene

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

Pollutant: Methyl Isobutyl Ketone

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

Pollutant: Phenol

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

Pollutant: Methyl Ethyl Ketone

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

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

a. changes in the composition of the materials used (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;

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

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

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

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

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

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

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

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0125041529 Emissions Unit ID: K002 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
exterior surface coating line (one water wash paint booth and one 3.15 mmBtu/hr baking oven)	OAC rule 3745-31-05(A)(3) (PTI # 01-6362)	Combined emissions from K001-K003 shall not exceed 100.71 tons of volatile organic compounds (VOC) per year. VOC emissions from the application of coatings shall not exceed 64.5 pounds per hour. VOC emissions from the application of coatings and cleanup materials shall not exceed 34.12 tons per year. Combined emissions from K001-K003 shall not exceed 2.0 tons of particulate emissions per year. See A.2.a - A.2.c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11(B)(1) and 3745-21-09(U)(1)(e).
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 6.98 pounds per hour.
	OAC rule 3745-17-07 (A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3475-21-09 (U)(1)(e)	4.3 pounds volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents.

2. **Additional Terms and Conditions**

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

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

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

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

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II. **Operational Restrictions**

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

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

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

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

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

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

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

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

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

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

   g. the total number of hours of operation; and

   h. the average hourly VOC emission rate from the application of coating. i.e., (e/g).

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

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

4. The permittee shall calculate and record the rolling, 12-month summation of the coating usage rates.

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

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

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IV. **Reporting Requirements**

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

2. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days after the event occurs.

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

4. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the rolling, 12-month summation of the coating usage limitation.

   The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

5. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing an exceedance of the monthly gallons usage limitation for n-butyl acetate. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

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

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V. **Testing Requirements**

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

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

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

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

b. Emission Limitation: Combined emissions from K001-K003 shall not exceed 100.71 tons VOC/yr

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

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

Compliance shall be based upon the record keeping requirements specified in sections A.III.1 and A.III.4 of this permit.

d. Emission Limitation: VOC emissions from the application of coatings shall not exceed 64.5 pounds per hour.

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

e. Emission Limitation: VOC emissions from the application of coatings and cleanup materials shall not exceed 34.12 tons per year.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

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

Compliance shall be based upon the record keeping requirements specified in section A.III.6 of this permit.

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

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

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

h. Emission Limitation:
Particulate emissions shall not exceed 6.98 pounds per hour.

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

E = particulate emissions rate (lbs/hr)

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (60% according to 40 CFR 60.453)

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

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

i. mission Limitation: Combined emissions from K001-K003 shall not exceed 2.0 tons of particulate emissions per year.

Applicable Compliance Method:

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

E = particulate emissions rate (tons/yr)

= maximum coating solids usage rate in tons per year (calculated by multiplying the annual coating usage recorded in A.III.4 of this permit by the coating density and then by the weight % solids of the coating) X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (60% according to 40 CFR 60.453)

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

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

2. Emission Limitation: Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0125041529 Emissions Unit ID: K002 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
exterior surface coating line (one water wash paint booth and one 3.15 mmBtu/hr baking oven)		

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit was evaluated based on the actual 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: Toluene

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

Pollutant: Methyl Isobutyl Ketone

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

Pollutant: Phenol

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

Pollutant: Methyl Ethyl Ketone

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

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

a. changes in the composition of the materials used (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;

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

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

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

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

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

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

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

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0125041529 Emissions Unit ID: K003 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
lid coating line (one paint booth, one lining booth and one 3.15 mmBtu/hr baking oven)	OAC rule 3745-31-05(A)(3) (PTI # 01-6362)	Combined emissions from K001-K003 shall not exceed 100.71 tons of volatile organic compounds (VOC) per year. VOC emissions from the application of coatings shall not exceed 64.5 pounds per hour. VOC emissions from the application of coatings and cleanup materials shall not exceed 34.12 tons per year. Combined emissions from K001-K003 shall not exceed 2.0 tons of particulate emissions per year. See A.2.a-A.2.c The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-11(B)(1) and 3745-21-09(U)(1)(e).
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 6.98 pounds per hour.
	OAC rule 3745-17-07 (A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3475-21-09 (U)(1)(e)	4.3 pounds volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents.

2. **Additional Terms and Conditions**

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

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

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

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

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II. **Operational Restrictions**

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

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

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

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

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

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

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

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

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

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

   g. the total number of hours of operation; and

   h. the average hourly VOC emission rate from the application of coating. i.e., (e/g).

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

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

4. The permittee shall calculate and record the rolling, 12-month summation of the coating usage rates.

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

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

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IV. **Reporting Requirements**

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

2. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days after the event occurs.

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

4. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedances of the rolling, 12-month summation of the coating usage limitation.

   The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

5. The permittee shall notify the Ohio EPA, Central District Office in writing of any monthly record showing an exceedance of the monthly gallons usage limitation for n-butyl acetate. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days following the end of the calendar month.

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

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V. **Testing Requirements**

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

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

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

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

b. Emission Limitation: Combined emissions from K001-K003 shall not exceed 100.71 tons VOC/yr

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

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

Compliance shall be based upon the record keeping requirements specified in sections A.III.1 and A.III.4 of this permit.

d. Emission Limitation: VOC emissions from the application of coatings shall not exceed 64.5 pounds per hour.

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

e. Emission Limitation: VOC emissions from the application of coatings and cleanup materials shall not exceed 34.12 tons per year.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section A.III.2 of this permit.

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

Compliance shall be based upon the record keeping requirements specified in section A.III.6 of this permit.

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

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

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

h. Emission Limitation:
Particulate emissions shall not exceed 6.98 pounds per hour.

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

E = particulate emissions rate (lbs/hr)

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

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (60% according to 40 CFR 60.453)

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

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

i. mission Limitation: Combined emissions from K001-K003 shall not exceed 2.0 tons of particulate emissions per year.

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

E = particulate emissions rate (tons/yr)

= maximum coating solids usage rate in tons per year (calculated by multiplying the annual coating usage recorded in A.III.4 of this permit by the coating density and then by the weight % solids of the coating) X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (60% according to 40 CFR 60.453)

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

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

2. Emission Limitation: Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method: If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0125041529 Emissions Unit ID: K003 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
lid coating line (one paint booth, one lining booth and one 3.15 mmBtu/hr baking oven)		

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit was evaluated based on the actual 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: Toluene

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

   Pollutant: Methyl Isobutyl Ketone

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

   Pollutant: Phenol

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

   Pollutant: Methyl Ethyl Ketone

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

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

   a. changes in the composition of the materials used (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;

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

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

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

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

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

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

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

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0125041529 Emissions Unit ID: P003 Issuance type: Title V Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
paint mix and pumping room	OAC rule 3745-31-05(A)(3) (PTI # 01-6389)	Organic compound emissions shall not exceed 1.98 pounds per hour, 19.8 pounds per day and 3.1 tons per year. See A.2.a-A.2.c and A.II.1 below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

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

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

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

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II. **Operational Restrictions**

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

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

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

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

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

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

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

performed).

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

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

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

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

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IV. **Reporting Requirements**

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

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

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

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

   The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

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

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V. **Testing Requirements**

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

   a. Emission Limitation:
      1.98 lbs OC/hr

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

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

   b. Emission Limitation:
      19.8 lbs OC/day

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

   c. Emission Limitation:
      3.1 tons OC/year

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

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

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

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

      Compliance shall be based upon the summation of the operating hours specified in section A.III.5 of this permit for the calendar year.

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

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

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0125041529 Emissions Unit ID: P003 Issuance type: Title V Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
paint mix and pumping room	none	none

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None