



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

8/6/2010

PEGGY MULLINS
WELLMAN PRODUCTS GROUP
920 LAKE ROAD
MEDINA, OH 44256

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1652050085
Permit Number: P0106100
Permit Type: Renewal
County: Medina

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: ARAQMD



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
WELLMAN PRODUCTS GROUP**

Facility ID: 1652050085
Permit Number: P0106100
Permit Type: Renewal
Issued: 8/6/2010
Effective: 8/6/2010
Expiration: 12/1/2018



Division of Air Pollution Control
Permit-to-Install and Operate
for
WELLMAN PRODUCTS GROUP

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Authorization

Facility ID: 1652050085
Application Number(s): A0039025
Permit Number: P0106100
Permit Description: Renewal PTIO for emissions units K001, K002, K004, N001, N002, and P002-P015.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 8/6/2010
Effective Date: 8/6/2010
Expiration Date: 12/1/2018
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

WELLMAN PRODUCTS GROUP
920 LAKE ROAD
Medina, OH 44256

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Chris Korleski
Director



Authorization (continued)

Permit Number: P0106100
Permit Description: Renewal PTIO for emissions units K001, K002, K004, N001, N002, and P002-P015.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID: K001
Company Equipment ID: Spray Booth
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: K002
Company Equipment ID: Binks Spray Booth
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: K004
Company Equipment ID: Shoe Dip Line
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Group Name: Group 1

Emissions Unit ID:	N001
Company Equipment ID:	Coating line cleaning oven
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	N002
Company Equipment ID:	Cleaning Furnace No. 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Group 2

Emissions Unit ID:	P002
Company Equipment ID:	Hawk Performance Area Mixing
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	Hawk Performance Area Preform Press #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	Hawk Performance Area Preform Press #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	Hawk Performance Area Preform Press #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Group 3

Emissions Unit ID:	P006
Company Equipment ID:	Hawk Performance Area Blanchard Grinder #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	Hawk Performance Area Blanchard Grinder #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P008
Company Equipment ID:	Hawk Performance Area Altech Groover #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P009
Company Equipment ID:	Hawk Performance Area Gear Grinder #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P010
Company Equipment ID:	Hawk Performance Area 6 Inch Belt Sander #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P011
Company Equipment ID:	Hawk Performance Area 6 Inch Belt Sander #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Group 4

Emissions Unit ID:	P012
Company Equipment ID:	Aircraft Area Erie Press #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P013
Company Equipment ID:	Aircraft Area Erie Press #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P014
Company Equipment ID:	Aircraft Area Erie Press #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P015
Company Equipment ID:	Aircraft Area Erie Press #4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that

exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions

1. K001, Spray Booth

Operations, Property and/or Equipment Description:

Spray Booth - Miscellaneous Metal Parts Coating Line

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(U)(2)(e)(ii)	See c)(1) below.
b.	OAC rule 3745-17-11(A)(1)(i)	This emissions unit is exempt from OAC rule 3745-17-11(C) because the surface coating processes less than five gallons of coatings per day and the owner or operator maintains coating usage records, coating purchase records, and/or production records that clearly demonstrate the actual coating usage is less than five gallons per day.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall employ no more than 3 gallons of coatings per day in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed; and
 - c. the total volume, in gallons, of all of the coatings employed.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) None.

2. K002, Binks Spray Booth

Operations, Property and/or Equipment Description:

Binks Spray Booth - Brake Pads

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	See c)(2) and c)(3) below. 35.74 pounds of volatile organic compounds (VOC) per day 15.66 pounds of toluene per day
b.	OAC rule 3745-21-09(U)(2)(e)(ii)	See c)(1) below.
c.	OAC rule 3745-17-11(A)(1)(i)	This emissions unit is exempt from OAC rule 3745-17-11(C) because the surface coating processes less than five gallons of coatings per day and the owner or operator maintains coating usage records, coating purchase records, and/or production records that clearly demonstrate the actual coating usage is less than five gallons per day.

- (2) Additional Terms and Conditions
 - a. None.
- c) Operational Restrictions
 - (1) The permittee shall employ no more than 3 gallons of coatings per day in this emissions unit.
 - (2) The permittee shall maintain exhaust filters to control overspray.
 - (3) The permittee shall be limited to the usage of 2 gallons per day of zinc chromate primer, as applied, and 5 pounds per day of gray primer.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed (i.e., zinc chromate primer usage);
 - c. the total volume, in gallons, of all of the coatings employed; and
 - d. the gray primer usage, in pounds.
 - (2) The permittee shall collect and record the following information for each month for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the VOC content of each coating and cleanup material, in pounds per gallon;
 - d. the toluene content of each coating and cleanup material, in pounds per gallon;
 - e. the total VOC emission rate for all coatings and cleanup materials, in pounds per month;
 - f. the total toluene emission rate for all coatings and cleanup materials, in pounds per month;
 - g. the total number of days the emissions unit was in operation;
 - h. the average daily VOC emission rate for all coatings and cleanup materials [i.e., $d(2)(e)/d(2)(g)$], in pounds per day (average); and
 - i. the average daily toluene emission rate for all coatings and cleanup materials [i.e., $d(2)(f)/d(2)(g)$], in pounds per day (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.].

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limits. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
- (2) The permittee shall identify in the annual permit evaluation report (PER) the following information concerning the operations of this emissions unit during the 12-month reporting period:
 - an identification of each month during which the average daily VOC emissions exceeded 35.74 pounds of VOC per day, and the actual average daily VOC emissions for each such month; and
 - an identification of each month during which the average daily toluene emissions exceeded 15.66 pounds of toluene per day, and the actual average daily toluene emissions for each such month.
- (3) Annual PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following methods:
 - a. Emission Limitation:
35.74 pounds of VOC per day

Applicable Compliance Method:

Compliance with the daily allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above.

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, the permittee 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:

15.66 pounds of toluene per day

Applicable Compliance Method:

Compliance with the daily allowable toluene emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above.

Formulation data shall be used to determine the toluene contents for the coatings and cleanup materials.

g) Miscellaneous Requirements

(1) None.

3. K004, Shoe Dip Line

Operations, Property and/or Equipment Description:

Shoe Dip Line - coating steel cores.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	7.14 pounds of organic compounds (OC) per hour for coatings 31.27 tons of OC per year for coatings The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(i).
b.	OAC rule 3745-21-09(U)(1)(i)	3.0 pounds volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents

(2) Additional Terms and Conditions

a. The hourly OC emission limitation regulated per OAC rule 3745-31-05(A)(3) is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with this limit.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee, having chosen to demonstrate compliance through the use of compliant coatings, shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:

- a. the name and identification number of each coating, as applied; and
- b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

$$C_{voc,2} = \frac{(D_c)(W_{voc})}{V_s + V_{voc}}$$

where:

D_C = the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

V_S = volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific "gallons/year" and/or "tons/year"

limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

- (2) The permittee shall collect and record the following information each month for the purpose of determining annual OC emissions:
- a. the name and identification of each coating employed;
 - b. the OC content of each coating, in pounds per gallon or weight fraction;
 - c. the number of gallons or pounds of each coating employed; and
 - d. the total OC emissions from all coatings employed, in tons per month (i.e., the sum of d)(2)(b) times d)(2)(c) for each coating employed, and then divide by 2000 pounds per ton).
- (3) The permit to install for this emissions unit (K004) 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: Acetone

TLV (mg/m³): 1187

Maximum Hourly Emission Rate (lbs/hr): 6.54

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m³): 302.7

MAGLC (ug/m³): 28,261.9

Pollutant: Isopropyl Alcohol

TLV (mg/m³): 983

Maximum Hourly Emission Rate (lb/hr): 0.50

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m³): 23.14

MAGLC (ug/m³): 23,404.8

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 and operate 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. 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.

e) Reporting Requirements

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

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following method(s):

a. Emission Limitation:

3.0 pounds VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in d)(1) above. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24 shall be used to determine the VOC contents of 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:

7.14 pounds of OC per hour for coatings

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation above shall be demonstrated by multiplying the maximum gallons of coating per hour (1.2 gallons per hour) times the coating density (7.04 pounds per gallon) times weight fraction of OC (0.845).

c. Emission Limitation:

31.3 tons of OC per year for coatings

Applicable Compliance Method:

Compliance with the annual allowable OC emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above.

g) Miscellaneous Requirements

- (1) None.

4. Emissions Unit Group - Group 1: N001, N002,

EU ID	Operations, Property and/or Equipment Description
N001	Coating line cleaning oven - pyrolytic incinerator.
N002	Controlled pyrolysis cleaning furnace - Cleaning furnace No. 1.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	For emissions units N001 and N002: Particulate emissions (PE) from each emissions unit shall not exceed 0.02 pound per hour and 0.09 ton per year The emissions of carbon monoxide (CO) from each emissions unit shall not exceed 0.05 pound per hour and 0.22 ton per year. The emissions of nitrogen oxides (NOx) from each emissions unit shall not exceed 0.05 pound per hour and 0.22 ton per year. The emissions of sulfur dioxide (SO2) from each emissions unit shall not exceed 0.01 pound per hour and 0.04 ton per

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>year.</p> <p>The emissions of volatile organic compounds (VOC) from each emissions unit shall not exceed 0.02 pound per hour and 0.09 ton per year.</p> <p>Visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-09.</p>
b.	OAC rule 3745-17-07(A)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-09	<p>0.20 pound of particulate emissions per one hundred pounds of liquid, semi-solid or solid refuse and salvageable material charged</p> <p>The incinerator, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.</p>

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) The permittee shall only burn natural gas as fuel in the emissions units listed above.
- (2) The permittee shall not process parts which may emit vapors of toxic metals such as lead or mercury.
- (3) The permittee shall not process parts or materials containing coatings or plastics which contain halogens such as chlorine, fluorine, or bromine.
- (4) No parts or materials shall be charged until sufficient time has been allowed for the preheating of the secondary chamber. Both the primary and secondary burners shall be kept in operation during the entire time the emissions units listed above are in use. The auxiliary burner shall be fired until the necessary burndown time is achieved.

- (5) The secondary chamber of the emissions units listed above shall be maintained at a temperature of at least 1400 degrees Fahrenheit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain following information for the emissions units listed above:
 - a. the MSDS sheets for each material being removed from the salvageable material;
 - b. documentation as to whether or not the material being removed contains any toxic metals; and
 - c. documentation as to whether or not the material being removed contains any halogens.
- (2) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature within the secondary chamber of each emissions unit when the emissions unit(s) is/are in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- (3) The permittee shall collect and record the following information for each day for each emissions unit listed above:
 - a. all 3-hour blocks of time during which the average combustion temperature within the secondary chamber of either emissions unit, when the emissions unit was in operation, was less than 1400 degrees Fahrenheit; and
 - b. a log of the downtime for the control device and monitoring equipment, when the associated emissions unit was in operation.

e) Reporting Requirements

- (1) The permittee shall identify in the annual permit evaluation report (PER) the following information concerning the operations of the emissions units listed above during the 12-month reporting period:
 - a. all 3-hour blocks of time during which the average combustion temperature within the secondary chamber of either emissions unit, when the emissions unit was in operation, was less than 1400 degrees Fahrenheit; and
 - b. any record showing the processing of material in either emissions unit that is prohibited in c)(2) and c)(3) above.
- (2) Annual PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting

period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitation(s) in b)(1) above shall be determined in accordance with the following method(s):

a. Emission Limitation:

PE from each emissions units shall not exceed 0.02 pound per hour

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation above shall be demonstrated by multiplying the allowable emission limitation of 0.20 pound of particulate emissions per one hundred pounds of liquid, semi-solid or solid refuse and salvageable material charged by the maximum amount of material charged.

b. Emission Limitation:

The emissions of CO from each emissions unit shall not exceed 0.05 pound per hour.

Applicable Compliance Method:

Compliance with the hourly allowable CO emission limitation above shall be demonstrate by multiplying the US EPA Fire 6.22 (SCC 5-02-001-01) CO emission factor of 10 pounds of CO per ton of solid waste burned by the maximum hourly amount of solid waste burned.

c. Emission Limitation:

The emissions of NOx from each emissions unit shall not exceed 0.05 pound per hour.

Applicable Compliance Method:

Compliance with the hourly allowable NOx emission limitation above shall be demonstrated by multiplying the AP-42 (Table 1.4-1 date 7-98) NOx emission factor of 100 pounds of NOx per million standard cubic feet of natural gas fired by the maximum hourly amount of natural gas fired.

d. Emission Limitation:

The emissions of SO2 from each emissions unit shall not exceed 0.01 pound per hour

Applicable Compliance Method:

Compliance with the hourly allowable SO2 emission limitation above shall be demonstrated by multiplying the US EPA Fire 6.22 (SCC 5-02-001-01) SO2

emission factor of 2.5 pounds of SO₂ per ton of solid waste burned by the maximum hourly amount of solid waste burned.

e. Emission Limitation

The emissions of VOC from each emissions unit shall not exceed 0.02 pound per hour

Applicable Compliance Method

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated by multiplying the US EPA Fire 6.22 (SCC 5-02-001-01) VOC emission factor of 3.0 pounds of VOC per ton of solid waste burned by the maximum hourly amount of solid waste burned.

f. Emission Limitations:

PE from each emissions unit shall not exceed 0.09 ton per year

The emissions of CO from each emissions unit shall not exceed 0.22 ton per year.

The emissions of NO_x from each emissions unit shall not exceed 0.22 ton per year.

The emissions of SO₂ from each emissions unit shall not exceed 0.04 ton per year.

The emissions of VOC from each emissions unit shall not exceed 0.09 ton per year.

Applicable Compliance Method:

Compliance with the annual allowable emission limitations above shall be demonstrated by multiplying the hourly allowable emission limitation by the maximum operating hours of 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

g. Emission Limitation

0.20 pound of particulate emissions per one hundred pounds of liquid, semi-solid or solid refuse and salvageable material charged

Applicable Compliance Method

If required, compliance with the PE limitation above shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-03(B)(8).

h. Emission Limitation

Visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average.

Applicable Compliance Method

If required, compliance with the visible PE limitation above shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group - Group 2: P002, P003, P004, P005,

EU ID	Operations, Property and/or Equipment Description
P002	Blender controlled by a baghouse - Hawk Performance Area Mixing.
P003	Preform press controlled by a baghouse - Hawk Performance Area Preform Press 1.
P004	Preform press controlled by a baghouse - Hawk Performance Area Preform Press 2.
P005	Preform press controlled by a baghouse - Hawk Performance Area Preform Press 3.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>The particulate emissions (PE) from the baghouse stack from combined emissions units P002, P003, P004, and P005 shall not exceed 1.15 pounds per hour and 5.04 tons per year.</p> <p>Visible PE from the baghouse stack shall not exceed five percent opacity, as a six-minute average.</p> <p>The permittee shall employ equipment (e.g., hoods) to capture and vent the particulate emissions to the baghouse.</p>
b.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11	The emission limitation specified by 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 hourly and annual particulate emission limitations regulated per OAC rule 3745-31-05(A)(3) are based on the combined emissions units' potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the permit to install and operate (PTIO) or a new final PTIO prior to the change(s).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 2.0 to 5.0 inches of water.

This operational range for the pressure drop shall not apply during the first 7 days of operation following filter change out.

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
b. the magnitude of the deviation at that time;

- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall record the date that the baghouse's filter was changed out.

e) Reporting Requirements

- (1) The permittee shall identify in the annual permit evaluation report (PER) the following information concerning the operations of the baghouse during the 12-month reporting period for these emissions units:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (2) Annual PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in b)(1) above shall be determined in accordance with the following method(s):
- a. Emission Limitation:

The PE from the baghouse stack from combined emissions units P002, P003, P004, and P005 shall not exceed 1.15 pounds per hour and 5.04 tons per year.

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation above shall be demonstrated by multiplying the particulate emissions factor 0.01 grain per dry standard cubic foot* (dscf) by the maximum air flow rate (6700 cfm) times 60 minutes per hour divided by 7000 grains per pound times 2**.

If required, compliance with the hourly allowable PE limitation above shall be demonstrated by using the test method(s) and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

Compliance with the annual allowable PE limitation above shall be demonstrated by multiplying the hourly allowable PE limitation by the maximum operating hours of 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

*Maximum emission rate from baghouse manufacturer's specifications
**Safety Factor

b. Emission Limitation:

Visible PE from the baghouse stack shall not exceed five percent opacity, as a six-minute average.

Applicable Compliance Method

If required, compliance with the visible PE limitation above shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group - Group 3: P006, P007, P008, P009, P010, P011,

EU ID	Operations, Property and/or Equipment Description
P006	Blanchard grinder controlled by a baghouse - Hawk Performance Area Blanchard Grinder 1.
P007	Blanchard grinder controlled by a baghouse - Hawk Performance Area Blanchard Grinder 2.
P008	Altech groover controlled by a baghouse - Hawk Performance Area Altech Groover 1.
P009	Gear grinder controlled by a baghouse - Hawk Performance Area Gear Grinder 1.
P010	6 inch belt sander controlled by a baghouse - Hawk Performance Area 6 Inch Belt Sander 1.
P011	6 inch belt sander controlled by a baghouse - Hawk Performance Area 6 Inch Belt Sander 2.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>The particulate emissions (PE) from the baghouse stack from combined emissions units P006, P007, P008, P009, P010 and P011 shall not exceed 1.72 pounds per hour and 7.53 tons per year.</p> <p>Visible PE from the baghouse stack shall not exceed five percent opacity, as a six-minute average.</p> <p>The permittee shall employ equipment (e.g., hoods) to capture and vent the particulate emissions to the baghouse.</p>
b.	OAC rule 3745-17-07(A)	The emission limitation specified by this

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11	The emission limitation specified by 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 hourly and annual particulate emission limitations regulated per OAC rule 3745-31-05(A)(3) are based on the combined emissions units' potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the permit to install and operate (PTIO) or a new final PTIO prior to the change(s).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 2.0 to 5.0 inches of water.

This operational range for the pressure drop shall not apply during the first 7 days of operation following filter change out.

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;

- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall record the date that the baghouse's filter was changed out.

e) Reporting Requirements

- (1) The permittee shall identify in the annual permit evaluation report (PER) the following information concerning the operations of the baghouse during the 12-month reporting period for these emissions units:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (2) Annual PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in b)(1) above shall be determined in accordance with the following method(s):
- a. Emission Limitation:

The PE from the baghouse stack from combined emissions units P006, P007, P008, P009, P010 and P011 shall not exceed 1.72 pounds per hour and 7.53 tons per year.

Applicable Compliance Method

Compliance with the hourly allowable PE limitation above shall be demonstrated by multiplying the particulate emissions factor 0.01 grain per dry standard cubic foot* (dscf) by the maximum air flow rate (10,000 cfm) times 60 minutes per hour divided by 7000 grains per pound times 2**.

If required, compliance with the hourly allowable PE limitation above shall be demonstrated by using the test method(s) and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

Compliance with the annual allowable PE limitation above shall be demonstrated by multiplying the hourly allowable PE limitation by the maximum operating hours of 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.
- *Maximum emission rate from baghouse manufacturer's specifications

****Safety Factor**

b. Emission Limitation

Visible PE from the baghouse stack shall not exceed five percent opacity, as a six-minute average.

Applicable Compliance Method

If required, compliance with the visible PE limitation above shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group - Group 4: P012, P013, P014, P015,

EU ID	Operations, Property and/or Equipment Description
P012	Erie press controlled by a baghouse - Aircraft Area Erie Press 1.
P013	Erie press controlled by a baghouse - Aircraft Area Erie Press 2.
P014	Erie press controlled by a baghouse - Aircraft Area Erie Press 3.
P015	Erie press controlled by a baghouse - Aircraft Area Erie Press 4.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>The particulate emissions (PE) from the baghouse stack from combined emissions units P012, P013, P014, and P015 shall not exceed 1.15 pounds per hour and 5.04 tons per year.</p> <p>Visible PE from the baghouse stack shall not exceed five percent opacity, as a six-minute average.</p> <p>The permittee shall employ equipment (e.g., hoods) to capture and vent the particulate emissions to the baghouse.</p>
b.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11	The emission limitation specified by 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 hourly and annual particulate emission limitations regulated per OAC rule 3745-31-05(A)(3) are based on the combined emissions units' potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these emission limitations.

However, if any proposed change(s), such as with production capacity, the types and/or quantities of materials used or processed, or anything else that increases the potential emissions of any air pollutant, then the permittee shall apply for and obtain either a modification to the permit to install and operate (PTIO) or a new final PTIO prior to the change(s).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 2.0 to 5.0 inches of water.

This operational range for the pressure drop shall not apply during the first 7 days of operation following filter change out.

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;

- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall record the date that the baghouse's filter was changed out.

e) Reporting Requirements

- (1) The permittee shall identify in the annual permit evaluation report (PER) the following information concerning the operations of the baghouse during the 12-month reporting period for these emissions units:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (2) Annual PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitation(s) in b)(1) above shall be determined in accordance with the following method(s):
- a. Emission Limitation:

The particulate emissions from the baghouse stack from combined emissions units P012, P013, P014, and P015 shall not exceed 1.15 pounds per hour and 5.04 tons per year.

Applicable Compliance Method

Compliance with the hourly allowable PE limitation above shall be demonstrated by multiplying the particulate emissions factor 0.01 grain per dry standard cubic foot* (dscf) by the maximum air flow rate (6700 cfm) times 60 minutes per hour divided by 7000 grains per pound times 2**.

If required, compliance with the hourly allowable PE limitation above shall be demonstrated by using the test method(s) and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

Compliance with the annual allowable PE limitation above shall be demonstrated by multiplying the hourly allowable PE limitation by the maximum operating hours of 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

*Maximum emission rate from baghouse manufacturer's specifications

**Safety Factor

b. Emission Limitation

Visible PE from the baghouse stack shall not exceed five percent opacity, as a six-minute average.

Applicable Compliance Method

If required, compliance with the visible PE limitation above shall be determined in accordance with the test method and procedures specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.