Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

6/13/2011

Certified Mail

Yes	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED

Mr. Richard Olechnowicz
Duracote Corp.
350 North Diamond Street
P.O. Box 1209
Ravenna, OH 44266-1209

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1667060088
Permit Number: P0107410
Permit Type: OAC Chapter 3745-31 Modification
County: Portage

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it 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 Josh Mandel," 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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Akron Regional Air Quality Management District. This permit can be accessed electronically on the Division of Air Pollution Control (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: U.S. EPA
ARAQMD; Pennsylvania; West Virginia; Canada

Response to Comments

Response to comments for: Permit-To-Install

Facility ID:	1667060088
Facility Name:	Duracote Corp.
Facility Description:	Coated Fabrics, Not Rubberized.
Facility Address:	350 North Diamond Street P.O. Box 1209 Ravenna, OH 44266-1209 Portage County
Permit #:	P0107410, OAC Chapter 3745-31 Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Record Courier on 05/14/2011. The comment period ended on 06/13/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: **None**
    a. Comment: **None**
    b. Response: **None**
2. Topic: **None**
    a. Comment: **None**
    b. Response: **None**

NO COMMENTS RECEIVED.

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Duracote Corp.

Facility ID:	1667060088
Permit Number:	P0107410
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	6/13/2011
Effective:	6/13/2011

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Duracote Corp.

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 7
9. Reporting Requirements 7
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 9
14. Public Disclosure 9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 10
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 13
1. K006, Laminator #3 14

Authorization

Facility ID: 1667060088
Facility Description: Coated Fabrics, Not Rubberized.
Application Number(s): A0040908
Permit Number: P0107410
Permit Description: Change in the method of operation via removal of the annual operating hours restriction for emissions unit K006 and instead imposing facility-wide VOC material usage and emissions restrictions to avoid Major New Source Review.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $200.00
Issue Date: 6/13/2011
Effective Date: 6/13/2011

This document constitutes issuance to:

Duracote Corp.
350 North Diamond Street
P.O. Box 1209
Ravenna, OH 44266-1209

of a Permit-to-Install 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 a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0107410
Permit Description: Change in the method of operation via removal of the annual operating hours restriction for emissions unit K006 and instead imposing facility-wide VOC material usage and emissions restrictions to avoid Major New Source Review.

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

Emissions Unit ID:	**K006**
Company Equipment ID:	Laminator #3
Superseded Permit Number:	16-02231
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

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

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

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

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

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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

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

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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

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

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Akron Regional Air Quality Management District.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Akron Regional Air Quality Management District. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Akron Regional Air Quality Management District every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Akron Regional Air Quality Management District in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

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

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

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

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

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

d) The permittee shall submit progress reports to the Akron Regional Air Quality Management District concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Akron Regional Air Quality Management District.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission

limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Akron Regional Air Quality Management District. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as “permanently shut down” in Ohio EPA’s “Air Services” 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).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed.The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

C. Emissions Unit Terms and Conditions

1. K006, Laminator #3

Operations, Property and/or Equipment Description:

Roll coating application of adhesive and top coat to vinyl and fabric laminate substrates, organic solvents flashed off with indirect heat transfer drying oven. Maximum coating application rate 10 gallons per hour. No add-on emissions control employed. This permit includes a Chapter 31 modification to change the method of operation via removal of the annual operating hours restriction (established in Permit to Install #16-02231, issued final May 6, 2003) and substituting a VOC material annual usage rate restriction to avoid Major New Source review. Duracote is subject to the Printing, Coating, and Dyeing of Fabric and Other Textiles Surface Coating MACT Standards as provided in 40 CFR Part 63, Subpart OOOO. Under40 CFR Part 63, Subpart OOOO, emissions unit K006 is an existing web coating affected source. Duracote chooses to comply with the applicable organic HAP emission rate in Table 1 to Subpart OOOO of Part 63, as specified in 40 CFR 63.4291(a)(2) *Emission rate without add-on controls option*.

a) 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.

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)	The volatile organic compound (VOC) content of the coatings employed shall not exceed a daily, volume-weighted average of 2.90 pounds per gallon, as applied, excluding water and exempt solvents. VOC emissions shall not exceed 29.0 pounds per hour, as a daily average, from coatings. [The hourly VOC emission limit is based upon a maximum VOC content of 2.90 pounds per gallon of coating and a maximum coating application rate of 10 gallons per hour.]

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements established pursuant to this rule also include the requirements of OAC rule 3745-31-05(D), 40 CFR Part 63, Subpart A and 40 CFR Part 63, Subpart OOOO.
b.	OAC rule 3745-31-05(D) (to avoid Major New Source review)	VOC emissions (from coatings and cleanup materials) from this facility (emissions units K001, K002, K003, K004 and K006, combined) shall not exceed 249 tons per year, as a rolling, 12-month summation of the monthly VOC emission rates. This facility (emissions units K001, K002, K003, K004 and K006, combined) has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the monthly VOC emission rates, upon final issuance of this permit. See c)(2) and d)(2).
c.	OAC rule 3745-21-09(G) OAC rule 3745-21-09(H)(1)(a)	The VOC emission limitations required by these rules are less stringent than the VOC emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 63, Subpart OOOO	Per §63.4283(c), the owner/operator of an existing affected source must achieve compliance with the applicable provisions of this subpart no later than 3 years after May 29, 2003. Per §63.4291(a)(2) *Emission rate without add-on controls option* and Table 1. #2 to Subpart OOOO of Part 63, the permittee of this existing affected coating operation shall limit organic HAP emissions to the atmosphere to no more than 0.12 kg of organic HAP per kg of solids applied, calculated as a rolling 12-month average emission rate. See b(2)b. and b(2)c.; d(4) and d(5); e(4) and e(5); and f(1)d.

e.	40 CFR Part 63, Subpart A	Per §63.4301, Table 3 to 40 CFR Part 63 Subpart OOOOshows which parts of the General Provisions in §§63.1 through 63.15 are applicable to Subpart OOOO. The complete 40 CFR Part 63 requirements, including the General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov.

(2) Additional Terms and Conditions

a. The permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final Permit-to-Install (PTI) prior to making any change to VOC contents of coatings applied, production capacity, cleanup materials, etc., or any change(s) to the method of operation, or any other change to this emissions unit that results in an increase in the allowable emissions or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 of any type of air contaminant not previously emitted.

b. Per §63.4300(a)(2), the permittee must be in compliance with the applicable organic HAP emissions limit specified in §63.4291(a)(2) *Emission rate without add-on controls option* and Table 1. #2 to Subpart OOOO of Part 63 for all compliance periods.

c. Per §63.4300(b), the permittee must always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).

c) Operational Restrictions

(1) Prior to the use of any coating in this coating line, the permittee shall determine that the coating meets the toxic screening criteria described below.

Purpose: The purpose of this test is to evaluate coatings to determine if the chemical compounds in the coatings would be emitted at acceptable levels for the general permit.

Data Needed: (1) MSDS sheet for each coating to be evaluated. (2) information on the maximum coating usage rate for the line as discussed in Step 1 below.

Step 1. Using the following factors, calculate the maximum coating usage rate in terms of gallons per hour:

a. Assume the coating line operates at its maximum speed while still making usable product.

b. Assume the coating line is operating at its largest coating laydown rate. This would typically be accomplished by assuming the coating line is painting the largest part available.

Step 2. Review the material safety data sheet (MSDS) for the coating. Note each chemical compound listed, its TLV and the percent by weight of the chemical compound in the coating.

Step 3. Determine if any of the chemical compounds listed in the MSDS are also listed in the following table. If any of the chemical compounds are listed in the table, then calculate the maximum annual emission of that compound by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. Then multiply the result by 8760 hours per year. The result will be in pounds per year.

Check to see if the calculated emission rate is less than the allowable emission rate found in the below table. If all of the compounds emitted have a maximum annual emissions of less than the allowed rate, then move on to step 4. If any of the compounds are emitted at a rate higher than the allowed emission rate, then contact yourappropriate District Office or local air agency contact to determine if you can use the coating.

Chemical Compound	CAS	Molecular Weight (MW)	Allowed Emission Rate (lb/year)
arsenic compounds, as As	7440-38-2	74.92	1.70
benzene	71-43-2	78.11	1100
benzidine	92-87-5	184.23	5.60
benzo(a)pyrene	50-32-8	252.30	6.90
beryllium (and Be compounds)	7440-41-7	9.01	0.350
Cadmium	7440-43-9	112.4	5.20
Chromium	7440-47-3	varies	0.690
Hexachlorobenzine (HCB)	118-74-1	289.78	35.0
mercury (and Hg compounds)	7439-97-6	200.59	0.1
nickel (Ni subsulfide)	12035-72-2	240.19	17.0
Polychlorinated dibenzo-p-dioxins	1746-01-6	varies	0.030
Polychlorinated dibenzofurans	132-64-9	varies	0.030
polychlorinated biphenyls (PCBs, aroclors)	1336-36-3	varies	87.0
vinyl chloride	75-01-4	62.50	2000

Step 4. Find all of the chemical compounds in the coating that have a listed American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV). For each chemical compound with a listed TLV (other than those in the above table), calculate the maximum short-term emission rate by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. The result should be in terms of pounds of the chemical compound per hour.

Step 5. Determine if the compound will be emitted at or below the acceptable rate. This is done by searching the following table for the chemical compound's TLV and then determining the maximum allowed emission rate listed in the below table. (Note. If the TLV is listed as ppm, then convert the TLV to $\mu g/m^3$ by using the following formula: (TLV in ppm)x(MW)x(1000)/24.45 = TLV in $\mu g/m^3$; where MW is the molecular weight of the compound.) This table lists the allowable emission rates for compounds with a TLV between the high range and low range. Compare the maximum calculated short-term emission rate of each chemical compound to the allowed emission rate in the table. If the maximum emission rate is less than the allowed emission rate, then the chemical compound is emitted at an acceptable rate.

TLV Range ($\mu g/m^3$) (The TLV must be less than the high value listed and greater than or equal to the low value listed)		Allowed Emission Rate (lb/hr)
15	1	0.000067
30	15	0.0010
60	30	0.0020
120	60	0.0040
240	120	0.0080
480	240	0.0160
960	480	0.0320
1,920	960	0.0640
3,840	1,920	0.128
7,680	3,840	0.256
15,360	7,680	0.512
30,720	15,360	1.02
61,440	30,720	2.05
122,880	61,440	4.10
245,760	122,880	8.19
491,520	245,760	16.4
983,040	491,520	32.8
1,966,080	983,040	65.5
3,932,160	1,966,080	131

Step 6. Check each chemical compound that has a listed TLV. If all compounds are emitted at a rate less than the allowed emission rate, then the coating passes the toxic screening test and can be used under this permit. If one or more of the chemical compounds are emitted at a rate greater than the allowed emission rate, then you should contact your appropriate District Office or local air agency contact to determine if you can use the coating.

(2) The maximum annual VOC material usage* (from coatings and cleanup materials) for this facility (emissions units K001, K002, K003, K004 and K006, combined) shall not exceed 249 tons, based upon a rolling, 12-month summation of the VOC material usage rates.

This facility (emissions units K001, K002, K003, K004 and K006, combined) has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the monthly VOC material usage rates, upon final issuance of this permit.

*Annual VOC material usage rate (input) is equivalent to an annual VOC emissions rate, and is based upon all the solvent in the materials employed or applied being emitted.

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 VOC content (excluding water and exempt solvents) of each coating, as applied.

c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.

d. The daily VOC emissions from all the coatings employed, in pounds, [i.e., the sum of d)(2)b. times d)(2)c. for each coating employed].

e. The daily volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

f. The total number of hours this emissions unit was in operation.

g. The average hourly VOC emissions from all coatings employed, in pounds [i.e., the quotient of d)(1)d. divided by d)(1)f.].

Note: If the VOC content of each of the coatings employed during a day is less than 2.90 pounds per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

(2) The permittee shall collect and record the following information each month for this facility (emissions units K001, K002, K003, K004 and K006, combined) to determine the total VOC material usage and emissions:

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

b. the weight, in pounds per month, of each coating, as applied;

c. the weight, in pounds per month, of each cleanup material, as applied;

d. the VOC content of each coating, as applied, in percent by weight;

e. the VOC content of each cleanup material, as applied, in percent by weight;

f. the total VOC material usage of all coatings, as applied, in pounds per month, i.e., f = sum[b x d] for all coatings;

g. the total VOC material usage of all cleanup materials, in pounds per month, i.e., g = sum[c x e] for all cleanup materials, excluding cleanup material recovered;

h. the total VOC material usage of all coatings and cleanup materials, as applied, in tons per month, i.e., h = [f + g]/2000;

i. the total VOC emissions from all coatings and cleanup materials, as applied, in tons per month, i.e., i = h, since emissions rate equals usage rate;

j. the rolling, 12-month total VOC material usage rates of all coatings and cleanup materials, as applied, in tons per year; and

k. the rolling, 12-month total VOC emissions rates from all coatings and cleanup materials, as applied, in tons per year, i.e., k = j, since emissions rate equals usage rate.

(3) The permittee shall collect and record the results of any toxic screening evaluations done per c)(1).

(4) The permittee shall comply with the following applicable record keeping requirements identified in 40 CFR Part 63, Subpart OOOO:

Applicable Rule	Requirement
§63.4312	The permittee must collect and keep a record of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard. See d)(5
§63.4313	The permittee must maintain and keep required records according to §63.10(b)(1).

(5) Per §63.4312, the permittee must collect and keep the following records for any web coating operation complying with the emission rate without add-on controls option:

a. A copy of each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report.

b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data or test data used to determine the mass fraction of organic HAP for coating, printing, slashing, dyeing, finishing, thinning, and cleaning materials; and the mass fraction of solids for coating and printing materials. If you conducted testing to determine mass fraction of organic HAP of coating materials or the mass fraction of solids of coating materials, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must

keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

c. A record of the web coating/printing operations on which you used each compliance option, i.e., the emission rate without add-on controls option, and the time periods (beginning and ending dates) you used each option. For each month, a record of all required calculations for the compliance option(s) you used, as specified below:

   i. For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coating, printing, thinning and cleaning materials applied each compliance period using Equations 1, 1A, and 1B of §63.4331 and, if applicable, the calculation used to determine the mass of organic HAP in waste materials according to §63.4331(a)(4)(iii); the calculation of the total mass of the solids contained in all coating and printing materials applied each compliance period using Equation 2 of §63.4331; and the calculation of the organic HAP emission rate for each compliance period using Equation 3 of §63.4331.

d. A record of the name and mass of each regulated material applied in the web coating and printing subcategory and the dyeing and finishing subcategory during each compliance period.

e. A record of the mass fraction of organic HAP for each regulated material applied during each compliance period.

f. A record of the mass fraction of coating and printing solids for each coating and printing material applied during each compliance period.

g. If you use an allowance in Equation 1 or 4 of §63.4331 for organic HAP contained in waste materials sent to, or designated for shipment to, a treatment, storage, and disposal facility (TSDF) according to §63.4331(a)(4)(iii) or (b)(3)(ii), you must keep records of the information, as specified below:

   i. The name and address of each TSDF to which you sent waste materials for which you used an allowance in Equation 1 or 4 of §63.4331, a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility, and the date of each shipment.

   ii. Identification of the web coating/printing or dyeing/finishing operations producing waste materials included in each shipment and the compliance period(s) in which you used the allowance for these materials in Equation 1 or 4, respectively, of §63.4331.

   iii. The methodology used in accordance with §63.4331(a)(3)(iii) or (b)(4)(ii) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each

compliance period; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.

h. If you use an allowance in Equation 4 of §63.4331 for organic HAP contained in wastewater discharged to a POTW or treated onsite prior to discharge according to §63.4331(c), you must keep records of the information, as specified below:

i. Documentation that the wastewater was either discharged to a POTW or onsite secondary wastewater treatment.

ii. Calculation of the allowance, WW, using the fraction of organic HAP applied in affected processes that is discharged to the wastewater determined from the most recent performance test and the mass of organic HAP in the dyeing and finishing materials applied during the compliance period, A, calculated in Equation 4 of §63.4331.

i. You must keep records of the date, time, and duration of each deviation.

e) Reporting Requirements

(1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily, volume-weighted average greater than 2.90 pounds VOC per gallon coating, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.

(2) The permittee shall submit quarterly reports that identify each day/month VOC emissions exceeded the following limits:

a. VOC emissions shall not exceed 29.0 pounds per hour, as a daily average from coatings;

b. The maximum annual VOC material usage* (from coatings and cleanup materials) for this facility (emissions units K001, K002, K003, K004 and K006, combined) shall not exceed 249 tons, based upon a rolling, 12-month summation of the VOC material usage rates; and

c. VOC emissions (from coatings and cleanup materials) from this facility (emissions units K001, K002, K003, K004 and K006, combined) shall not exceed 249 tons per year, as a rolling, 12-month summation of the monthly emission rates.

The quarterly deviations reports shall be submitted to the Director (appropriate District

Office or local air agency) in accordance with the Standard Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year
and shall cover the previous calendar quarter.

(3) The permittee shall submit annual compliance reports that include:

a. a list of all allowable emissions limits and operational restrictions in b)(1), c)(1) and c)(2); and

b. a statement whether the emissions unit is in compliance with the requirements listed.

The report shall be submitted to the Director (the appropriate District Office or local air agency) by February 1 of each year and shall cover the previous calendar year.

Annual Compliance Certification reports submitted according to the requirements of the Title V program are sufficient to meet this requirement.

(4) The permittee shall comply with the following applicable notification and reporting requirements identified in 40 CFR Part 63, Subpart OOOO:

Applicable Rule	Requirement
§63.4310	The permittee must submit the *Initial Notification* and *Notification of Compliance Status* and all other applicable notifications by the dates and in accordance with the requirements specified in this section.
§63.4311	The permittee must submit *Semiannual Compliance Reports*according to the specified schedule and applicable requirements of paragraphs (a)(1) through (8) of this section. See e)(5).

(5) Per §63.4311, the permittee must submit semiannual compliance reports for each affected source according to the requirements, as specified below:

a. *Dates.* Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must prepare and submit each semiannual compliance report according to the dates in §63.4311(a)(1)(i) through (iv), as specified below:

i. The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in §§63.4320, 63.4330, 63.4340, or 63.4350 that applies to your affected source and ends on June 30 or December 31, whichever date is the first date at least 6 months after the end of the initial compliance period.

ii. Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

iii. Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

iv. For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) of this section.

b. *Inclusion with title V report.* Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

c. *General requirements.* The semiannual compliance report must contain the information specified in paragraphs (a)(3)(i) through (v) of this section, and the information specified in paragraphs (a)(4) through (8) and (c)(1) of this section that is applicable to your affected source. If your affected source is a slashing operation(s), you are only required to report the information in paragraphs (a)(3)(i) through (iii) of this section and the information in paragraph (a)(4) or (a)(5) of this section, as applicable.

i. Company name and address.

ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

iii. Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31.

iv. Identification of the compliance option or options specified in §63.4291 that you used on each web coating/printing and dyeing/finishing operation

during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates you used each option.

v. If you used the emission rate without add-on controls, the emission rate with add-on controls, or the organic HAP overall control efficiency compliance option for web coating/printing operations (§63.4291(a)(2), (3), or (4)), or the emission rate without add-on controls or the emission rate with add-on controls compliance option for dyeing/finishing operations (§63.4291(c)(2) or (c)(3)), the calculation results for each compliance period ending each month during the 6-month reporting period.

d. *No deviations.* If there were no deviations from the emission limitations in Table 1 to this subpart and §§63.4292, and 63.4293 that apply to you, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. If you use the emission rate with add-on controls option, the organic HAP overall control efficiency option, or the oxidizer outlet organic HAP concentration option and there were no periods during which the continuous parameter monitoring systems (CPMS) were out-of-control as specified in §63.8(c)(7), the semiannual compliance report must include a statement that there were no periods during which the CPMS were out-of-control during the reporting period.

e. *Deviations: emission rate without add-on controls option.* If you use the emission rate without add-on controls option and there was a deviation from the applicable emission limit in Table 1 to this subpart, the semiannual compliance report must contain the information in §63.4311(a)(6)(i) through (iii), as specified below:

i. The beginning and ending dates of each compliance period during which the organic HAP emission rate exceeded the applicable emission limit in Table 1 to this subpart.

ii. The calculations used to determine the organic HAP emission rate for the compliance period in which the deviation occurred. You must submit the calculations for Equations 1, 1A and 1B, 2, and 3 in §63.4331 for web coating/printing operations; and for Equations 4, 4A, 5, and 6 in §63.4331 for dyeing/finishing operations; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.4331(a)(4)(iii) or (b)(3)(ii); and, for dyeing/finishing operations, if applicable, the mass of organic HAP in wastewater streams calculation for Equation 7 in §63.4331. You do not need to submit background data supporting these calculations (*e.g.,* information provided by materials suppliers or manufacturers, or test reports).

iii. A statement of the cause of each deviation.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

The VOC content of the coatings employed shall not exceed a daily, volume-weighted average of 2.90 pounds per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall based upon the record keeping specified in d)(1) of the terms and conditions of this permit.

b. Emissions Limitation:

VOC emissions shall not exceed 29.0 pounds per hour, as a daily average from coatings.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1) of the terms and conditions of this permit..

c. Emissions Limitation:

VOC emissions (from coatings and cleanup materials) from this facility (emissions units K001, K002, K003, K004 and K006, combined) shall not exceed 249 tons per year, as a rolling, 12-month summation of the monthly emission rates.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2) of the terms and conditions of this permit..

d. Emissions Limitation:

The permittee of this existing affected coating operation shall limit organic HAP emissions to the atmosphere to no more than 0.12 kg of organic HAP per kg of solids applied, calculated as a rolling 12-month average emission rate, for the emission rate without add-on controls option.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the dates, procedures, equations and other requirements, as specified in §§63.4330, 63.4331 and 63.4332 of 40 CFR Part 63, Subpart OOOO.

(2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler,Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake,Licking, Lorain, Lucas, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit,Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine theVOC 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 aparticular coating, the permittee shall so notify the Administrator of the USEPA and shalluse formulation data for that coating to demonstrate compliance until the USEPAprovides alternative analytical procedures or alternative precision statements for Method24.

Facilities located in all other counties shall use USEPA Method 24 or formulation data to determine the VOC contents of the coatings.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

g) Miscellaneous Requirements

(1) None.