OhioEPA
State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: FINAL PERMIT TO INSTALL
FRANKLIN COUNTY
Application No: 01-01289
Fac ID: 0125070213

DATE: 5/16/2006

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
MMMM	**MACT**
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

Columbus Steel Drum
Brian Grannan
1385 Blatt Blvd
Blacklick, OH 43004

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. 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, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **CDO**

Permit To Install	**Issue Date: 5/16/2006**
Terms and Conditions	**Effective Date: 5/16/2006**

FINAL PERMIT TO INSTALL 01-01289

Application Number: 01-01289

Facility ID: 0125070213

Permit Fee: **$600**

Name of Facility: Columbus Steel Drum

Person to Contact: Brian Grannan

Address: 1385 Blatt Blvd
Blacklick, OH 43004

Location of proposed air contaminant source(s) [emissions unit(s)]:
1385 Blatt Blvd
Blacklick, **Ohio**

Description of proposed emissions unit(s):
Interior drum lining operation, K001, exterior drum coating operation, K002 and drum lid lining coating operations K003.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

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

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

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, 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:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, 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 appropriate Ohio EPA District Office or local air agency. 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 B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency 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.

iv. If this permit is for an emissions unit located at a Title V facility, then 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.

2. Scheduled Maintenance/Malfunction Reporting

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

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

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any 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. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. 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.

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

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

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

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

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

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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

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

10. Permit-To-Operate Application

a. If 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).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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.

2. 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 appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from 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 appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing 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 modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

5. Construction of New Sources(s)

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.

6. 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.

7. 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).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

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

C. Permit-To-Install Summary of Allowable Emissions

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
NOx	16.2
CO	13.61
VOC	27.17
SO2	0.1
PM	12.3

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Interior lining operation of steel drums and a 2.0 mmBtu/hr oven controlled by a Permanent Total Enclosure and Regenerative Thermal Oxidizer	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound(VOC) emissions from linings shall not exceed 1.75 pounds per hour and 7.67 tons per year. Volatile Organic Compound(VOC) emissions from clean up materials employed in emissions units K001 through K003 shall not exceed 6.71 pounds per hour and 3.5 tons per year. See A.2.a-e below. Emissions from natural gas usage in the incinerator and associated oven shall not exceed: 1.176 lbs NOx/hr; 5.15 tons NOx/yr; 0.007 lb SO2/hr; 0.031 ton SO2/yr; 0.988 lb CO/hr; 4.33 tons CO/yr; 0.09 lb PM/hr; 0.39 ton PM/yr; 0.0647 lb VOC/yr; and 0.28 ton VOC/yr Particulate emissions from linings shall not exceed 3.07 tons per year.

	Visible particulate matter (PM) emissions shall not exceed 5% opacity. Compliance with this rule also includes compliance with the requirements of 40 CFR 63 subpart MMMM and OAC rule 3745-17-11(B)(1).
OAC rule 3745-17-07(A)(1)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.7 pound per hour.
OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6)	The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
40 CFR 63 subpart MMMM	See A.2.f-i.

2. Additional Terms and Conditions

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

2.b The Permanent Total Enclosure (PTE) serving this emissions unit shall be installed and constructed in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) .

2.c The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a Regenerative Thermal Oxidizer with a minimum control efficiency of 98%.

2.d The VOC content of each lining, as applied, shall not exceed 4.3 pounds of VOC per gallon, minus water and exempt solvents

2.e The VOC content of the clean up material, as applied, shall not exceed 6.71 pounds of VOC per gallon, minus water and exempt solvents

2.f This emissions unit is subject to the applicable provisions of the National Emission Standards for Hazardous Air pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR 63. The

application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 63 are also federally enforceable.

2.g This emissions unit is subject to applicable sections of 40 CFR Part 63, Subpart A as denoted in 40 CFR Part 63, Subpart MMMM, Table 1.

2.h The permittee has chosen to comply with the "Add on Controls Option" available in Subpart MMMM: 63.3891(c). This option has operational restrictions, work practice requirements and monitoring and record keeping requirements.

2.i In accordance with 40 CFR 63.3890(b)(1) and by January 2, 2007, the organic HAP emissions shall not exceed 2.6 pounds of organic HAP per gallon of solids during each 12 month compliance period. The Organic HAP emission rate shall be as a rolling 12-month emission rate and determined on a monthly basis.

2.j The hourly and annual emission limitations from natural gas combustion in the oven and in the Regenerative Thermal Oxidizer were established to reflect the potential to emit from the combustion of natural gas for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations specific to the combustion of natural gas.

II. Operational Restrictions

1. The minimum combustion temperature of the Regenerative Thermal Oxidizer shall be maintained at 1,400 degrees Fahrenheit or higher until initial emissions testing has been completed. Thereafter, the average temperature of the exhaust gases from the combustion chamber of the thermal incinerator, for any successive 3-hour period of time, shall not be below the average temperature observed during the most recent emission test that demonstrated the emissions unit was in compliance. The combustion temperature of the Regenerative Thermal Oxidizer and the average temperature of the combustion chamber of the Regenerative Thermal Oxidizer shall be measured at the same location.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, as averaged on an hourly basis, whenever the emission unit is in operation.

3. Each lining employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.2 on an "as applied" basis.

4. In accordance with 40 CFR 63.3893(b) and by January 2, 2007, the permittee shall develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and /or other additives, and cleaning materials used in and waste materials generated by the coating operation.

5. In accordance with 40 CFR 63.3900 and by January 2, 2007, the permittee shall comply with the develop and implement a written startup, shutdown, and malfunction plan according to the provisions in 40 CFR 63.6(e)(3).

6. In accordance with 40 CFR 63.3892(b) and by January 2, 2007, the permittee shall comply with the operating limits specified in Table 1 of subpart MMMM.

7. The exit of the stack serving this emissions unit shall be a minimum of 50 feet above ground.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the Regenerative Thermal Oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter and shall record a minimum of one data point per minute.. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations. This monitoring system consists of all the equipment used to acquire data and includes the data recording/processing hardware and software.

2. For each day this emissions unit operates, the permitttee shall collect and record the following information for this emissions unit:

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

   b. the VOC content of each lining, as applied, in pounds per gallon;

   c. the number of gallons of each lining employed;

   d. the total number of hours the emissions unit was operated;

   e. the total uncontrolled VOC emission rate from all linings , in pounds ([the summation of A.III.2.b X A.III.2.c for each lining] ;

   f. the calculated, controlled VOC emission rate for all linings in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance; and

   g. the average hourly controlled VOC emission rate, in pounds per hour, i.e., A.III.2.f/A.III.2.d. This calculation shall be performed within 7 days of the date this emissions unit operated.

3. The permittee shall maintain and operate monitoring device(s) and a recorder which continuously measure and record the pressure differential from outside to inside the permanent total enclosure. This monitoring system consists of all the equipment used to

acquire data and includes the data recording/processing hardware and software. The monitoring and recording device(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The monitoring and recording devices shall be capable of accurately measuring the desired parameter and shall record a minimum of one data point per minute.

4. The permittee shall collect and record the following information for each operating day:

   a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;

   b. all successive 3-hour periods of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was below the average temperature observed during the most recent emission test that demonstrated that the emissions unit was in compliance;

   c. prior to the initial compliance demonstration, all successive 3-hour periods of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was less than 1400 degrees; and

   d. all rolling, 1-hour blocks of time during which the average pressure differential between the permanent total enclosure and the outside area(s), when the emissions unit was in operation, was less than 0.007 inch of water column.

5. For each lining, the permittee shall receive a USEPA Method 24 analysis with each shipment from the lining supplier. The analysis shall identify the name and address of the supplier, the supplier’s coating identification number, and the following information:

   a. date of shipment or delivery;

   b. quantity of lining received, in gallons;

   c. CSD’s lining identification number;

   d. the VOC content of each lining, in pounds per gallon, excluding water and exempt solvents.

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

7. The permittee shall maintain a copy of each notification and report submitted to comply with the requirements of 40 CFR Part 63, Subpart MMMM.

8. In accordance with 40 CFR 62.3968 and by January 2, 2007 , the permittee shall comply the capture and control system requirements for continuous parameter monitoring system installation, operation, and maintenance.

9. The permittee shall maintain the records required by 40 CFR 63.3930.

10. This facility shall maintain daily records which list the following information for the combined cleanup material employed in emissions units K001 through K003

    a. the name and identification of each cleanup material;

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

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

    d. the total VOC emissions from all cleanup material employed, prior to any credit for recovered materials, in pounds i.e., the summation of the products of the amounts (c) of all cleanup materials applied (a) in emissions units K001 through K003, above, times each material's VOC content (b).

11. If a credit for recovered materials is used to demonstrate compliance , the permittee shall maintain the following records for the recovered cleanup materials and the recovery tank serving the emissions units K001 through K003.

    a. the date the recovery tank was emptied;

    b. the date the materials from the recovery tank were shipped off site;

    c. the number of gallons of materials from the recovery tank shipped off site;

    d. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

    e. the total VOC emissions (in pounds) from recovered cleanup materials , to be credited against the total VOC emissions from all cleanup materials applied in emissions units K001 through K003.

    f. the average hourly VOC emission rate, in pounds per hour, i.e., A.III.2.d/ (A.III.10.d - A.III.11.e)

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

    a. any record of a pressure differential deviation (excursion) report that identifies all periods of time during which the permanent total enclosure was not maintained at

the required differential pressure of 0.007 inches of water, when the emissions unit was in operation;

b. an identification of each day, during which the average hourly VOC emissions from all linings used in the source exceeded 1.75 pounds per hour, and the actual average hourly VOC emissions for each such day;

c. an identification of all successive 3-hour periods of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature observed during the most recent performance test that demonstrated the emissions unit was in compliance, or below 1,400 degrees Fahrenheit until initial emissions testing has been completed; and

d. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.

e. an identification of each day, during which the average hourly VOC emissions from all cleanup materials used in emissions units K001 through K003 exceeded 6.71 pounds per hour, and the actual average hourly VOC emissions for each such day;

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

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

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Title V Fee Emission Report to be submitted by April 15 of each year.

4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the lining and clean up material VOC content limitations. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, CDO within 30 days of the deviation.

5. The permittee shall submit a notification of compliance status in accordance with 40 CFR 63.3910(c).

6. The permittee shall submit an initial notification report as required by 40 CFR 63.9(b)(2) of subpart A and shall be submitted by the dates specified by 40 CFR 63.9(b)(2) of subpart A.

7. The permittee shall submit semi annual reports in accordance with 40 CFR 63.3920.

V. Testing Requirements

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

   a. Emission Limitations: The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a Regenerative Thermal Oxidizer with a minimum control efficiency of 98%.

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

      i. The emission testing shall be conducted in accordance with paragraph 10 of the May 2005 Franklin County Environmental Court Consent Order.

      ii. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A, and 40 CFR Part 51, Appendix M, Method 204.

      iii. The test(s) shall be conducted while this emissions unit, K002 and K003 are venting VOC emissions to the Regenerative Thermal oxidizer. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

   The overall control efficiency of the control equipment serving this emissions unit shall be demonstrated based upon the results of the capture efficiency and control efficiency tests specified above. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA 's "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Section A.V.1.a.ii of this permit and OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

   Not later than 30 days prior to the proposed test date(s) and in accordance with paragraph 10 of the May 2005 Franklin County Environmental Court Consent Order, the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test

methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days and in accordance with paragraph 10 of the May 2005 Franklin County Environmental Court Consent Order following completion of the test(s).

2. Emission Limitation: Visible particulate emissions from the stack shall not exceed 5% opacity .

   Applicable Compliance Method: Compliance shall be determined using Method 9 as set forth in 40 CFR Part 60 Appendix A, as such appendix existed on July 1, 1996 and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

3. Emission Limitation: The VOC content of each lining, as applied, shall not exceed 4.3 pounds of VOC per gallon, minus water and exempt solvents

   Applicable Compliance Method: USEPA Method 24 shall be used to determine the VOC contents for the linings. If an owner or operator determines that Method 24 cannot be used for a particular lining, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that lining to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

4. Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 1.176 lbs of NOx/hr.

   Applicable Compliance Method: Compliance with the allowable mass emission rate for NOx emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 100 lb of NOx/mmscf by the associated RTO's maximum hourly fuel usage of 0.0098 mmscf/hr and the associated ovens's maximum hourly fuel usage of 0.00196 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

5. Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.988 lb of CO/hr .

Applicable Compliance Method: Compliance with the allowable mass emission rate for CO emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 84 lb of CO/mmscf by the associated RTO's maximum hourly fuel usage of 0.0098 mmscf/hr and the associated ovens's maximum hourly fuel usage of 0.00196 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

6. Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.007 lb of SO2/hr .

   Applicable Compliance Method: Compliance with the allowable mass emission rate for SO2 emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 0.6 lb of SO2/mmscf by the associated RTO's maximum hourly fuel usage of 0.0098 mmscf/hr and the associated ovens's maximum hourly fuel usage of 0.00196 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C.

7. Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.0647 lb of VOC/hr .

   Applicable Compliance Method: Compliance with the allowable mass emission rate for VOC emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 5.5 lb of VOC/mmscf by the associated RTO's maximum hourly fuel usage of 0.0098 mmscf/hr and the associated ovens's maximum hourly fuel usage of 0.00196 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

8. Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.09 lb of PM/hr.

   Applicable Compliance Method: Compliance with the allowable mass emission rate for particulate emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 7.6 lb of PM/mmscf by the associated RTO's maximum hourly fuel usage of 0.0098 mmscf/hr and the associated ovens's maximum hourly fuel usage of 0.00196 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the

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

9. Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.39 ton of PM/yr; Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.031 ton of SO2/yr; Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.28 ton of VOC/yr; Emissions from natural gas usage in the incinerator and associated oven shall not exceed 5.15 tons of NOx/yr; Emissions from natural gas usage in the incinerator and associated oven shall not exceed 4.33 tons of CO/yr.

   Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

10. Emission Limitation: Particulate emissions from the lining operation shall not exceed 0.7 pound per hour.

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

11. Emission Limitation: Volatile Organic Compound(VOC) emissions from linings shall not exceed 1.75 pounds per hour .

    Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section A.III.2.j .

12. Emission Limitation: Volatile Organic Compound(VOC) emissions from linings shall not exceed 7.67 tons per year.

    Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

13. Emission Limitation: Particulate emissions from coatings shall not exceed 3.07 tons per year.

    Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

14. Emission Limitation: Volatile Organic Compound(VOC) emissions from clean up materials employed in emissions units K001 through K003 shall not exceed 6.71 pounds per hour.

Applicable Compliance Method: Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section A.III.11.f.

15. Emission Limitation: Volatile Organic Compound(VOC) emissions from clean up materials employed in emissions units K001 through K003 shall not exceed 3.5 tons per year.

    Applicable Compliance Method: Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Sections A.III.10.d and A.III.11.e.

16. USEPA Method 24 shall be used to determine the VOC contents for the cleanup materials recovered. If an owner or operator determines that Method 24 cannot be used for a particular lining, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that lining to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Interior lining operation of steel drums and an oven controlled by a PTE and regenerative Thermal oxidizer	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K002 - Exterior coating operation and oven consisting of one 0.75 mmBTU/hr burner and one 1.2 mmBTU/hr burner, all controlled by a PTE and a Regenerative Thermal oxidizer	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound(VOC) emissions from coatings shall not exceed 2.85 pounds per hour and 12.48 tons per year. Volatile Organic Compound(VOC) emissions from clean up materials employed in emissions units K001 through K003 shall not exceed 6.71 pounds per hour and 3.5 tons per year. See A.2.a-e below. Emissions from natural gas usage in the incinerator and the associated oven shall not exceed: 1.15 lb NOx/hr; 5.04 tons NOx/yr; 0.007 lb SO2/hr; 0.03 ton SO2/yr; 0.966 lb CO/hr; 4.23 tons CO/yr; 0.087 lb PM/hr; 0.38 ton PM/yr; 0.063 lb VOC/yr; and 0.28 ton VOC/yr Visible particulate matter (PM) emissions shall not exceed 5% opacity.

	Particulate emissions from coatings shall not exceed 5.52 tons per year. Compliance with this rule also includes compliance with the requirements of 40 CFR 63 subpart MMMM and OAC rule 3745-17-11(B)(1).
OAC rule 3745-17-07(A)(1)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 1.26 pounds per hour.
OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6)	The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
40 CFR 63 subpart MMMM	See A.2.f-i.

2. Additional Terms and Conditions

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

2.b The Permanent Total Enclosure (PTE) serving this emissions unit shall be installed and constructed in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) .

2.c The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a Regenerative Thermal Oxidizer with a minimum control efficiency of 98%.

2.d The VOC content of each coating, as applied, shall not exceed 3.5 pounds of VOC per gallon, minus water and exempt solvents

2.e The VOC content of the clean up material, as applied, shall not exceed 6.71 pounds of VOC per gallon, minus water and exempt solvents

2.f This emissions unit is subject to the applicable provisions of the National Emission Standards for Hazardous Air pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR 63. The

application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 63 are also federally enforceable.

2.g This emissions unit is subject to applicable sections of 40 CFR Part 63, Subpart A as denoted in 40 CFR Part 63, Subpart MMMM, Table 1.

2.h The permittee has chosen to comply with the "Add on Controls Option" available in Subpart MMMM: 63.3891(c). This option has operational restrictions, work practice requirements and monitoring and record keeping requirements.

2.i In accordance with 40 CFR 63.3890(b)(1) and by January 2, 2007, the organic HAP emissions shall not exceed 2.6 pounds of organic HAP per gallon of solids during each 12 month compliance period. The Organic HAP emission rate shall be as a rolling 12-month emission rate and determined on a monthly basis.

2.j The hourly and annual emission limitations from natural gas combustion in the oven and in the Regenerative Thermal Oxidizer were established to reflect the potential to emit from the combustion of natural gas for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations specific to the combustion of natural gas.

II. Operational Restrictions

1. The minimum combustion temperature of the Regenerative Thermal Oxidizer shall be maintained at 1,400 degrees Fahrenheit or higher until initial emissions testing has been completed. Thereafter, the average temperature of the exhaust gases from the combustion chamber of the thermal incinerator, for any successive 3-hour period of time, shall not be below the average temperature observed during the most recent emission test that demonstrated the emissions unit was in compliance. The combustion temperature of the Regenerative Thermal Oxidizer and the average temperature of the combustion chamber of the Regenerative Thermal Oxidizer shall be measured at the same location.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, as averaged on an hourly basis, whenever the emission unit is in operation.

3. Each coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.2 on an "as applied" basis.

4. In accordance with 40 CFR 63.3893(b) and by January 2, 2007, the permittee shall develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and /or other additives, and cleaning materials used in and waste materials generated by the coating operation.

5. In accordance with 40 CFR 63.3900 and by January 2, 2007, the permittee shall comply with the develop and implement a written startup, shutdown, and malfunction plan according to the provisions in 40 CFR 63.6(e)(3).

6. In accordance with 40 CFR 63.3892(b) and by January 2, 2007, the permittee shall comply with the operating limits specified in Table 1 of subpart MMMM.

7. The exit of the stack serving this emissions unit shall be a minimum of 50 feet above ground.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the Regenerative Thermal Oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter and shall record a minimum of one data point per minute.. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations. This monitoring system consists of all the equipment used to acquire data and includes the data recording/processing hardware and software.

2. For each day this emissions unit operates, the permitttee shall collect and record the following information for this emissions unit:

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

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

   c. the number of gallons of each coating employed;

   d. the total number of hours the emissions unit was operated;

   e. the total uncontrolled VOC emission rate from all coatings , in pounds ([the summation of A.III.2.b X A.III.2.c for each coating] ;

   f. the calculated, controlled VOC emission rate for all coatings in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance; and

   g. the average hourly controlled VOC emission rate, in pounds per hour, i.e., A.III.2.f/A.III.2.d. This calculation shall be performed within 7 days of the date this emissions unit operated.

3. The permittee shall maintain and operate monitoring device(s) and a recorder which continuously measure and record the pressure differential from outside to inside the permanent total enclosure. This monitoring system consists of all the equipment used to

acquire data and includes the data recording/processing hardware and software. The monitoring and recording device(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The monitoring and recording devices shall be capable of accurately measuring the desired parameter and shall record a minimum of one data point per minute.

4. The permittee shall collect and record the following information for each operating day:

   a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;

   b. all successive 3-hour periods of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was below the average temperature observed during the most recent emission test that demonstrated that the emissions unit was in compliance;

   c. prior to the initial compliance demonstration, all successive 3-hour periods of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was less than 1400 degrees; and

   d. all rolling, 1-hour blocks of time during which the average pressure differential between the permanent total enclosure and the outside area(s), when the emissions unit was in operation, was less than 0.007 inch of water column.

5. For each lining, the permittee shall receive a USEPA Method 24 analysis with each shipment from the lining supplier. The analysis shall identify the name and address of the supplier, the supplier’s coating identification number, and the following information:

   a. date of shipment or delivery;

   b. quantity of lining received, in gallons;

   c. CSD’s lining identification number;

   d. the VOC content of each lining, in pounds per gallon, excluding water and exempt solvents.

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

7. The permittee shall maintain a copy of each notification and report submitted to comply with the requirements of 40 CFR Part 63, Subpart MMMM.

8. In accordance with 40 CFR 62.3968 and by January 2, 2007 , the permittee shall comply the capture and control system requirements for continuous parameter monitoring system installation, operation, and maintenance.

9. The permittee shall maintain the records required by 40 CFR 63.3930.

10. This facility shall maintain daily records which list the following information for the combined cleanup material employed in emissions units K001 through K003

    a. the name and identification of each cleanup material;

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

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

    d. the total VOC emissions from all cleanup material employed, prior to any credit for recovered materials, in pounds i.e., the summation of the products of the amounts (c) of all cleanup materials applied (a) in emissions units K001 through K003, above, times each material's VOC content (b).

11. If a credit for recovered materials is used to demonstrate compliance , the permittee shall maintain the following records for the recovered cleanup materials and the recovery tank serving the emissions units K001 through K003.

    a. the date the recovery tank was emptied;

    b. the date the materials from the recovery tank were shipped off site;

    c. the number of gallons of materials from the recovery tank shipped off site;

    d. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

    e. the total VOC emissions (in pounds) from recovered cleanup materials , to be credited against the total VOC emissions from all cleanup materials applied in emissions units K001 through K003.

    f. the average hourly VOC emission rate, in pounds per hour, i.e., A.III.2.d/ (A.III.10.d - A.III.11.e)

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

    a. any record of a pressure differential deviation (excursion) report that identifies all periods of time during which the permanent total enclosure was not maintained at

the required differential pressure of 0.007 inches of water, when the emissions unit was in operation;

b. an identification of each day, during which the average hourly VOC emissions from all coatings used in the source exceeded 2.85 pounds per hour, and the actual average hourly VOC emissions for each such day;

c. an identification of all successive 3-hour periods of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature observed during the most recent performance test that demonstrated the emissions unit was in compliance, or below 1,400 degrees Fahrenheit until initial emissions testing has been completed; and

d. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.

e. an identification of each day, during which the average hourly VOC emissions from all cleanup materials used in emissions units K001 through K003 exceeded 6.71 pounds per hour, and the actual average hourly VOC emissions for each such day;

These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

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

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Title V Fee Emission Report to be submitted by April 15 of each year.

4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the coating and clean up material VOC content limitations. These reports shall include a copy of such record and shall be submitted to the Ohio EPA, CDO within 30 days of the deviation.

5. The permittee shall submit a notification of compliance status in accordance with 40 CFR 63.3910(c).

6. The permittee shall submit an initial notification report as required by 40 CFR 63.9(b)(2) of subpart A and shall be submitted by the dates specified by 40 CFR 63.9(b)(2) of subpart A.

7. The permittee shall submit semi annual reports in accordance with 40 CFR 63.3920.

V. Testing Requirements

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

   a. Emission Limitations: The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a Regenerative Thermal Oxidizer with a minimum control efficiency of 98%.

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

      i. The emission testing shall be conducted in accordance with paragraph 10 of the May 2005 Franklin County Environmental Court Consent Order.

      ii. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A, and 40 CFR Part 51, Appendix M, Method 204.

      iii. The test(s) shall be conducted while this emissions unit, K001 and K003 are venting VOC emissions to the Regenerative Thermal oxidizer. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

   The overall control efficiency of the control equipment serving this emissions unit shall be demonstrated based upon the results of the capture efficiency and control efficiency tests specified above. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA 's "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Section A.V.1.a.ii of this permit and OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

   Not later than 30 days prior to the proposed test date(s) and in accordance with paragraph 10 of the May 2005 Franklin County Environmental Court Consent Order, the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test

methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days and in accordance with paragraph 10 of the May 2005 Franklin County Environmental Court Consent Order following completion of the test(s).

2. Emission Limitation: Visible particulate emissions from the stack shall not exceed 5% opacity .

   Applicable Compliance Method: Compliance shall be determined using Method 9 as set forth in 40 CFR Part 60 Appendix A, as such appendix existed on July 1, 1996 and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

3. Emission Limitation: The VOC content of each coating, as applied, shall not exceed 3.5 pounds of VOC per gallon, minus water and exempt solvents

   Applicable Compliance Method: USEPA Method 24 shall be used to determine the VOC contents for the coatings. If 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.

4. Emission Limitation: Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 1.15 lbs of NOx/hr.

   Applicable Compliance Method: Compliance with the allowable mass emission rate for NOx emissions from the natural gas usage in the incinerator and the associated oven may be determined by multiplying an emission factor of 100 lb of NOx/mmscf by the associated RTO's maximum hourly fuel usage of 0.010 mmscf/hr and each burner's maximum hourly fuel usage of 0.001 MMscf/hr and 0.0007 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

5. Emission Limitation: Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 0.966 lb CO/hr .

Applicable Compliance Method: Compliance with the allowable mass emission rate for CO emissions from the natural gas usage in the incinerator and the associated oven may be determined by multiplying an emission factor of 84 lb of CO/mmscf by the associated RTO's maximum hourly fuel usage of 0.010 mmscf/hr and each burner's maximum hourly fuel usage of 0.001 mmscf/hr and 0.0007 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

6. Emission Limitation: Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 0.007 lb of SO2/hr .

   Applicable Compliance Method: Compliance with the allowable mass emission rate for SO2 emissions from the natural gas usage in the incinerator and the associated oven may be determined by multiplying an emission factor of 0.6 lb of SO2/mmscf by the associated RTO's maximum hourly fuel usage of 0.010 mmscf/hr and each burner's maximum hourly fuel usage of 0.001 mmscf/hr and 0.0007 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C.

7. Emission Limitation: Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 0.063 lb of VOC/hr .

   Applicable Compliance Method: Compliance with the allowable mass emission rate for VOC emissions from the natural gas usage in the incinerator and the associated oven may be determined by multiplying an emission factor of 5.5 lb of VOC/mmscf by the associated RTO's maximum hourly fuel usage of 0.010 mmscf/hr and each burner's maximum hourly fuel usage of 0.001 mmscf/hr and 0.0007 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

8. Emission Limitation: Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 0.087 lb of PM/hr.

   Applicable Compliance Method: Compliance with the allowable mass emission rate for particulate emissions from the natural gas usage in the incinerator and the associated oven may be determined by multiplying an emission factor of 7.6 lb PM/mmscf by the associated RTO's maximum hourly fuel usage of 0.010 mmscf/hr and each burner's maximum hourly fuel usage of 0.001 mmscf/hr and 0.0007 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the

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

9. Emission Limitation: Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 0.38 ton of PM/yr; Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 0.03 ton of SO2/yr; Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 0.28 ton of VOC/yr; Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 5.04 tons of NOx/yr; Emissions from natural gas usage in the incinerator and the associated oven shall not exceed 4.23 tons of CO/yr.

   Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

10. Emission Limitation: Particulate emissions from the coating operation shall not exceed 1.26 pound per hour.

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

11. Emission Limitation: Volatile Organic Compound(VOC) emissions from coatings shall not exceed 2.85 pounds per hour .

    Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section A.III.2.j.

12. Emission Limitation: Volatile Organic Compound(VOC) emissions from coatings shall not exceed 12.48 tons per year.

    Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

13. Emission Limitation: Particulate emissions from coatings shall not exceed 5.52 tons per year.

    Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

14. Emission Limitation: Volatile Organic Compound(VOC) emissions from clean up materials employed in emissions units K001 through K003 shall not exceed 6.71 pounds per hour.

Applicable Compliance Method: Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section A.III.11.f.

15. Emission Limitation: Volatile Organic Compound(VOC) emissions from clean up materials employed in emissions units K001 through K003 shall not exceed 3.5 tons per year.

    Applicable Compliance Method: Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Sections A.III.10.d and A.III.11.e.

16. USEPA Method 24 shall be used to determine the VOC contents for the cleanup materials recovered. If an owner or operator determines that Method 24 cannot be used for a particular lining, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that lining to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K002 - Exterior coating operation and oven consisting of one 0.75 mmBTU/hr burner and one 1.2 mmBTU/hr burner, all controlled by a PTE and a Regenerative Thermal oxidizer	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K003 - Lid coating and lid lining operation with two 2.0 mmBtu/hr ovens controlled by a Permanent Total Enclosure and Regenerative Thermal Oxidizer	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound(VOC) emissions from coatings and linings shall not exceed 0.60 pound per hour and 2.63 tons per year. Volatile Organic Compound(VOC) emissions from clean up materials employed in emissions units K001 through K003 shall not exceed 6.71 pounds per hour and 3.5 tons per year. See A.2.a-i below. Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed: 1.37 lbs NOx/hr; 6.01 tons NOx/yr; 0.008 lb SO2/hr; 0.035 ton SO2/yr; 1.15 lbs CO/hr; 5.05 tons CO/yr; 0.104 lb PM/hr; 0.46 ton PM/yr; 0.075 lb VOC/yr; and 0.33 ton VOC/yr Particulate emissions from coatings and linings shall not exceed 2.41 tons per year.

	Visible particulate matter (PM) emissions shall not exceed 5% opacity. Compliance with this rule also includes compliance with the requirements of 40 CFR 63 subpart MMMM and OAC rule 3745-17-11(B)(1).
OAC rule 3745-17-07(A)(1)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 pound per hour.
OAC rule 3745-21-09(U)(1) or 3745-21-09(B)(6)	The volatile organic compound (VOC) emission limitations specified in these rules are less stringent than the VOC emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
40 CFR 63 subpart MMMM	See A.2.f-j.

2. Additional Terms and Conditions

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

2.b The Permanent Total Enclosure (PTE) serving this emissions unit shall be installed and constructed in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) .

2.c The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a Regenerative Thermal Oxidizer with a minimum control efficiency of 98%.

2.d The VOC content of each lining, as applied, shall not exceed 4.3 pounds of VOC per gallon, minus water and exempt solvents

2.e The VOC content of each coating, as applied, shall not exceed 3.5 pounds of VOC per gallon, minus water and exempt solvents

2.f The VOC content of the clean up material, as applied, shall not exceed 6.71 pounds of VOC per gallon, minus water and exempt solvents

2.g This emissions unit is subject to the applicable provisions of the National Emission Standards for Hazardous Air pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR 63. The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 63 are also federally enforceable.

2.h This emissions unit is subject to applicable sections of 40 CFR Part 63, Subpart A as denoted in 40 CFR Part 63, Subpart MMMM, Table 1.

2.i The permittee has chosen to comply with the "Add on Controls Option" available in Subpart MMMM: 63.3891(c). This option has operational restrictions, work practice requirements and monitoring and record keeping requirements.

2.j In accordance with 40 CFR 63.3890(b)(1) and by January 2, 2007, the organic HAP emissions shall not exceed 2.6 pounds of organic HAP per gallon of solids during each 12 month compliance period. The Organic HAP emission rate shall be as a rolling 12-month emission rate and determined on a monthly basis.

2.k The hourly and annual emission limitations from natural gas combustion in the ovens and in the Regenerative Thermal Oxidizer were established to reflect the potential to emit from the combustion of natural gas for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations specific to the combustion of natural gas.

II. Operational Restrictions

1. The minimum combustion temperature of the Regenerative Thermal Oxidizer shall be maintained at 1,400 degrees Fahrenheit or higher until initial emissions testing has been completed. Thereafter, the average temperature of the exhaust gases from the combustion chamber of the thermal incinerator, for any successive 3-hour period of time, shall not be below the average temperature observed during the most recent emission test that demonstrated the emissions unit was in compliance. The combustion temperature of the Regenerative Thermal Oxidizer and the average temperature of the combustion chamber of the Regenerative Thermal Oxidizer shall be measured at the same location.

2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, as averaged on an hourly basis, whenever the emission unit is in operation.

3. Each lining and coating employed in this emissions unit shall comply with the VOC content limitation specified in Section A.I.2 on an "as applied" basis.

4. In accordance with 40 CFR 63.3893(b) and by January 2, 2007, the permittee shall develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and /or other additives, and cleaning materials used in and waste materials generated by the coating operation.

5. In accordance with 40 CFR 63.3900 and by January 2, 2007, the permittee shall comply with the develop and implement a written startup, shutdown, and malfunction plan according to the provisions in 40 CFR 63.6(e)(3).

6. In accordance with 40 CFR 63.3892(b) and by January 2, 2007, the permittee shall comply with the operating limits specified in Table 1 of subpart MMMM.

7. The exit of the stack serving this emissions unit shall be a minimum of 50 feet above ground.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the Regenerative Thermal Oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter and shall record a minimum of one data point per minute.. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations. This monitoring system consists of all the equipment used to acquire data and includes the data recording/processing hardware and software.

2. For each day this emissions unit operates, the permitttee shall collect and record the following information for this emissions unit:

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

   b. the VOC content of each coating and lining, as applied, in pounds per gallon;

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

   d. the total number of hours the emissions unit was operated;

   e. the total uncontrolled VOC emission rate from all coatings and linings , in pounds ([the summation of A.III.2.b X A.III.2.c for each coating and lining] ;

   f. the calculated, controlled VOC emission rate for all coatings and linings in pounds. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance; and

   g. the average hourly controlled VOC emission rate, in pounds per hour, i.e., A.III.2.f/A.III.2.d. This calculation shall be performed within 7 days of the date this emissions unit operated.

3. The permittee shall maintain and operate monitoring device(s) and a recorder which continuously measure and record the pressure differential from outside to inside the permanent total enclosure. This monitoring system consists of all the equipment used to

acquire data and includes the data recording/processing hardware and software. The monitoring and recording device(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The monitoring and recording devices shall be capable of accurately measuring the desired parameter and shall record a minimum of one data point per minute.

4. The permittee shall collect and record the following information for each operating day:

   a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;

   b. all successive 3-hour periods of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was below the average temperature observed during the most recent emission test that demonstrated that the emissions unit was in compliance;

   c. prior to the initial compliance demonstration, all successive 3-hour periods of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was less than 1400 degrees; and

   d. all rolling, 1-hour blocks of time during which the average pressure differential between the permanent total enclosure and the outside area(s), when the emissions unit was in operation, was less than 0.007 inch of water column.

5. For each coating, the permittee shall receive a USEPA Method 24 analysis with each shipment from the coating supplier. The analysis shall identify the name and address of the supplier, the supplier's coating identification number, and the following information:

   a. date of shipment or delivery;

   b. quantity of coating received, in gallons;

   c. CSD's coating identification number; and

   d. the VOC content of each coating, in pounds per gallon, excluding water and exempt solvents.

6. For each lining, the permittee shall receive a USEPA Method 24 analysis with each shipment from the lining supplier. The analysis shall identify the name and address of the supplier, the supplier's lining identification number, and the following information:

   a. date of shipment or delivery;

   b. quantity of lining received, in gallons;

c. CSD's lining identification number;

d. the VOC content of each lining, in pounds per gallon, excluding water and exempt solvents.

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

8. The permittee shall maintain a copy of each notification and report submitted to comply with the requirements of 40 CFR Part 63, Subpart MMMM.

9. In accordance with 40 CFR 62.3968 and by January 2, 2007 , the permittee shall comply the capture and control system requirements for continuous parameter monitoring system installation, operation, and maintenance.

10. The permittee shall maintain the records required by 40 CFR 63.3930.

11. This facility shall maintain daily records which list the following information for the combined cleanup material employed in emissions units K001 through K003

a. the name and identification of each cleanup material;

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

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

d. the total VOC emissions from all cleanup material employed, prior to any credit for recovered materials, in pounds i.e., the summation of the products of the amounts (c) of all cleanup materials applied (a) in emissions units K001 through K003, above, times each material's VOC content (b).

12. If a credit for recovered materials is used to demonstrate compliance , the permittee shall maintain the following records for the recovered cleanup materials and the recovery tank serving the emissions units K001 through K003.

a. the date the recovery tank was emptied;

b. the date the materials from the recovery tank were shipped off site;

c. the number of gallons of materials from the recovery tank shipped off site;

d. the VOC content of the materials from the recovery tank, in pounds per gallon, acquired from the testing results of the recovered material; and

e. the total VOC emissions (in pounds) from recovered cleanup materials , to be credited against the total VOC emissions from all cleanup materials applied in emissions units K001 through K003.

f. the average hourly VOC emission rate, in pounds per hour, i.e., A.III.2.d/ (A.III.11.d - A.III.12.e)

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

   a. any record of a pressure differential deviation (excursion) report that identifies all periods of time during which the permanent total enclosure was not maintained at the required differential pressure of 0.007 inches of water, when the emissions unit was in operation;

   b. an identification of each day, during which the average hourly VOC emissions from all linings and coatings used in the source exceeded 0.60 pound per hour, and the actual average hourly VOC emissions for each such day;

   c. an identification of all successive 3-hour periods of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was below the average temperature observed during the most recent performance test that demonstrated the emissions unit was in compliance, or below 1,400 degrees Fahrenheit until initial emissions testing has been completed; and

   d. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.

   e. an identification of each day, during which the average hourly VOC emissions from all cleanup materials used in emissions units K001 through K003 exceeded 6.71 pounds per hour, and the actual average hourly VOC emissions for each such day;

   These reports are due by the date described in Part 1- General Terms and Conditions of this permit under section (A).

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

3. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Title V Fee Emission Report to be submitted by April 15 of each year.

4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the coating, lining and clean up material VOC content limitations. These reports shall

include a copy of such record and shall be submitted to the Ohio EPA, CDO within 30 days of the deviation.

5. The permittee shall submit a notification of compliance status in accordance with 40 CFR 63.3910(c).

6. The permittee shall submit an initial notification report as required by 40 CFR 63.9(b)(2) of subpart A and shall be submitted by the dates specified by 40 CFR 63.9(b)(2) of subpart A.

7. The permittee shall submit semi annual reports in accordance with 40 CFR 63.3920.

V. Testing Requirements

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

   a. Emission Limitations: The permittee shall control VOC emissions from this emissions unit through the use of a PTE and a Regenerative Thermal Oxidizer with a minimum control efficiency of 98%.

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

      i. The emission testing shall be conducted in accordance with paragraph 10 of the May 2005 Franklin County Environmental Court Consent Order.

      ii. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A, and 40 CFR Part 51, Appendix M, Method 204.

      iii. The test(s) shall be conducted while this emissions unit, K001 and K002 are venting VOC emissions to the Regenerative Thermal oxidizer. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

   The overall control efficiency of the control equipment serving this emissions unit shall be demonstrated based upon the results of the capture efficiency and control efficiency tests specified above. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA 's "Guidelines for Determining Capture Efficiency" dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass

emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in Section A.V.1.a.ii of this permit and OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s) and in accordance with paragraph 10 of the May 2005 Franklin County Environmental Court Consent Order, the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days and in accordance with paragraph 10 of the May 2005 Franklin County Environmental Court Consent Order following completion of the test(s).

2. Emission Limitation: Visible particulate emissions from the stack shall not exceed 5% opacity.

   Applicable Compliance Method: Compliance shall be determined using Method 9 as set forth in 40 CFR Part 60 Appendix A, as such appendix existed on July 1, 1996 and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

3. Emission Limitation: The VOC content of each coating, as applied, shall not exceed 3.5 pounds of VOC per gallon, minus water and exempt solvents**.**

   Applicable Compliance Method: USEPA Method 24 shall be used to determine the VOC contents for the coatings. If 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.

4. Emission Limitation: The VOC content of each lining, as applied, shall not exceed 4.3 pounds of VOC per gallon, minus water and exempt solvents

   Applicable Compliance Method: USEPA Method 24 shall be used to determine the VOC contents for the linings. If an owner or operator determines that Method 24 cannot

be used for a particular lining, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that lining to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

5. Emission Limitation: Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 1.37 lbs of NOx/hr.

   Applicable Compliance Method: Compliance with the allowable mass emission rate for NOx emissions from the natural gas usage in the incinerator and the two associated ovens may be determined by multiplying an emission factor of 100 lb of NOx/mmscf by the associated RTO's maximum hourly fuel usage of 0.0098 mmscf/hr and each associated ovens's maximum hourly fuel usage of 0.00196 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

6. Emission Limitation: Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 1.15 lbs of CO/hr .

   Applicable Compliance Method: Compliance with the allowable mass emission rate for CO emissions from the natural gas usage in the incinerator and the two associated ovens may be determined by multiplying an emission factor of 84 lb of CO/mmscf by the associated RTO's maximum hourly fuel usage of 0.0098 mmscf/hr and each associated ovens's maximum hourly fuel usage of 0.00196 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

7. Emission Limitation: Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 0.008 lb pf SO2/hr .

   Applicable Compliance Method: Compliance with the allowable mass emission rate for SO2 emissions from the natural gas usage in the incinerator and the two associated ovens may be determined by multiplying an emission factor of 0.6 lb of SO2/mmscf by the associated RTO's maximum hourly fuel usage of 0.0098 mmscf/hr and each associated ovens's maximum hourly fuel usage of 0.00196 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C.

8. Emission Limitation: Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 0.075 lb of VOC/hr .

Applicable Compliance Method: Compliance with the allowable mass emission rate for VOC emissions from the natural gas usage in the incinerator and the two associated ovens may be determined by multiplying an emission factor of 5.5 lb of VOC/mmscf by the associated RTO's maximum hourly fuel usage of 0.0098 mmscf/hr and each associated ovens's maximum hourly fuel usage of 0.00196 mmscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

9. Emission Limitation: Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 0.104 lb of PM/hr.

   Applicable Compliance Method: Compliance with the allowable mass emission rate for particulate emissions from the natural gas usage in the incinerator and the two associated ovens may be determined by multiplying an emission factor of 7.6 lb PM/MMscf by the associated RTO's maximum hourly fuel usage of 0.0098 MMscf/hr and each associated ovens's maximum hourly fuel usage of 0.00196 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

10. Emission Limitation: Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 0.46 ton of PM/yr; Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 0.035 ton of SO2/yr; Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 0.33 ton of VOC/yr; Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 6.01 tons of NOx/yr; Emissions from natural gas usage in the incinerator and the two associated ovens shall not exceed 5.05 tons of CO/yr;

    Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

11. Emission Limitation: Particulate emissions (PE) shall not exceed 0.551 lb/hr from coating operations.

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

12. Emission Limitation: Volatile Organic Compound(VOC) emissions from coatings and linings shall not exceed 0.60 pound per hour .

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section A.III.2.j.

13. Emission Limitation: Volatile Organic Compound(VOC) emissions from coatings and linings shall not exceed 2.63 tons per year.

    Applicable Compliance Method: Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

14. Emission Limitation: Particulate emissions from coatings and linings shall not exceed 2.41 tons per year.

    Applicable Compliance Method: Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

13. Emission Limitation: Volatile Organic Compound(VOC) emissions from clean up materials employed in emissions units K001 through K003 shall not exceed 6.71 pounds per hour.

    Applicable Compliance Method: Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section A.III.12.f.

16. Emission Limitation: Volatile Organic Compound(VOC) emissions from clean up materials employed in emissions units K001 through K003 shall not exceed 3.5 tons per year.

    Applicable Compliance Method: Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Sections A.III.11.d and A.III.12.e.

17. USEPA Method 24 shall be used to determine the VOC contents for the cleanup materials recovered. If an owner or operator determines that Method 24 cannot be used for a particular lining, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that lining to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K003 - Lid coating and lining operation and ovens controlled by a Permanent Total Enclosure and Regenerative Thermal Oxidizer	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None