

Synthetic Minor Determination and/or Netting Determination

Permit To Install **02-21113**

A. Source Description

Forest City Technologies Inc. operates under SIC code 4 02 025 01 at 299 Clay Street in Wellington, Ohio. The facility is a major source under Title V. Forest City Technologies Inc. has applied for a permit to install a metal parts coating line. The coating line, along with all of the other coating lines at the facility, is subject to 40 CFR, Part 63, Subpart M, the MACT standard for miscellaneous metal parts and products based on potential facility emissions. The coating line is also subject to OAC rule 3745-21-09(U)(1)(i) which limits the volatile organic compound (VOC) content of coatings employed to 3.0 lbs VOC/gallon, excluding water and exempt solvents. The facility is located in Lorain county.

B. Facility Emissions and Attainment Status

The metal parts coating line, a vapor degreaser utilizing methylene chloride, and other coating lines at the facility emit hazardous air pollutants (HAPs). The coating line also emits volatile organic compounds (VOCs). Maximum potential single HAP and combined HAP emissions for the facility exceed 10 and 25 tons per year, respectively. Potential VOC emissions from the coating line when coatings with 3.0 lbs VOC/gallon, excluding water and exempt solvents, are employed are 12.0 lbs/day and 3.83 tons per year. Lorain county is non-attainment for ozone.

C. Source Emissions

Forest City Technologies Inc. has proposed to limit HAP emissions facility-wide to 9.9 tons per year of each single HAP and 24.9 tons per year of combined HAPs. The facility has also proposed to limit VOC emissions to 0.91 ton per year in order to maintain the capability of employing coatings with VOC contents up to 3.0 lbs VOC/gallon, excluding water and exempt solvents, while limiting actual VOC emissions by employing coatings with VOC contents less than that allowed by OAC rule 3745-21-09(U)(1)(i). This permit to install will contain terms and conditions to establish these limits.

D. Conclusion

This permit to install will limit HAP emissions by limiting facility-wide HAP emissions over a rolling, 12-month period to 9.9 tons per year of each single HAP and 24.9 tons per year of combined HAPs. Forest City Technologies Inc. will be required to record the monthly facility-wide emissions of each single HAP and all combined HAPs from all of the coating lines, the vapor degreaser, and all other sources of HAP emissions, including but not limited to de minimis, exempt, and combustion sources. Exceedance reports will be submitted if necessary. In this way, the facility will address the issue of 40 CFR Part 63, Subpart M, by not being major for HAPs.

This permit to install will also limit VOC emissions over a rolling, 12-month period to 0.91 ton per year. The facility will be required to maintain a rolling, 12-month record of VOC emissions. Exceedance reports will be submitted if necessary. In this way, the facility will be capable of employing coatings on this coating line with VOC contents of up to 3.0 lbs VOC/gallon, excluding water and exempt solvents, while limiting actual annual VOC emissions to 0.91 ton per year.



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: DRAFT PERMIT TO INSTALL

LORAIN COUNTY

Application No: 02-21113

Fac ID: 0247170841

DATE: 9/1/2005

Forest City Technologies Inc Plant 2/4
Marshall Lichman
PO Box 86 299 Clay St
Wellington, OH 44090

CERTIFIED MAIL

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

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

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

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 02-21113 FOR AN AIR CONTAMINANT SOURCE FOR
Forest City Technologies Inc Plant 2/4**

On 9/1/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Forest City Technologies Inc Plant 2/4**, located at **401 Maygar St, Wellington, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-21113:

FP-Dip Line.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087 [(330)425-9171]

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 02-21113

Application Number: 02-21113

Facility ID: 0247170841

Permit Fee: **To be entered upon final issuance**

Name of Facility: Forest City Technologies Inc Plant 2/4

Person to Contact: Marshall Lichman

Address: PO Box 86 299 Clay St
Wellington, OH 44090

Location of proposed air contaminant source(s) [emissions unit(s)]:

**401 Maygar St
Wellington, Ohio**

Description of proposed emissions unit(s):

FP-Dip Line.

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.8 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

Forest City Technologies Inc Plant 2/4

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Issued: To be entered upon final issuance

Facility ID: 0247170841

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

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	0.91 TPY

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K050 - fluoropolymer dip (FP-Dip) coater and electric drying oven 55 (OV-55)	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-09(U)(1)(i) OAC rule 3745-31-05(C)	See A.I.2.c below. 3.0 pounds VOC per gallon of coating, excluding water and exempt solvents. VOC emissions shall not exceed 5.0 pounds per day and 0.91 ton per rolling, 12-month period. See A.I.2.a, A.I.2 b, and A.II.1 below.

2. Additional Terms and Conditions

- 2.a The emissions of each single hazardous air pollutant (HAP) from emissions units K007, K009, K010, K011, K012, K013, K039, K040, K041, K042, K043, K044, K045, K046, K047, K048, K049, K050, L001, and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation.
- 2.b The emissions of the combined HAPs from emissions units K007, K009, K010, K011, K012, K013, K039, K040, K041, K042, K043, K044, K045, K046, K047, K048, K049, K050, L001, and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation.
- 2.c Based upon the permittee's application, there are no cleanup materials associated with this emissions unit.

II. Operational Restrictions

1. The daily VOC in raw material usage shall not cause emissions to exceed 5.0 pounds per day.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this coating line (K050):
 - a. The name and identification number of each coating, as applied;
 - b. The volume, in gallons, of each coating, as applied, in gallons;
 - c. The VOC content of each coating, as applied, in pounds per gallon; and
 - d. The total VOC emissions from all coatings employed [summation of (b x c) for all coatings].
2. The permittee shall collect and record the following information each month for this coating line (K050):
 - a. The name and identification of each coating, as applied;
 - b. The total VOC emissions from all coatings employed (summation of A.III.1.d above for each month);
 - c. The mass of VOC per volume of each coating, excluding water and exempt solvents.

This information shall be retained at the facility for 3 years.

3. The permittee shall collect and record the following information each month:
 - a. For all coating lines at the facility, including all deminis and exempt coating lines:
 - i. The name and identification number of each coating, as applied;
 - ii. The volume, in gallons, of each coating, as applied, in pounds per gallon;
 - iii. The individual HAP content for each HAP in each coating, as applied, in pounds per gallon;
 - iv. The individual HAP content of each coating, as applied, in pounds per gallon; and
 - v. The total HAP emissions for all coating lines of each single HAP [summation of (ii x iii) for all coatings; for coating lines with control equipment (ii x iii) shall be multiplied by the overall control efficiency determined during the most recent emission test that demonstrated that

Forest City Technologies Inc Plant 2/4

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Emissions Unit ID: K050

the source was in compliance and added to the total sum of HAP emissions].

- b. For the vapor degreaser at the facility:
 - i. The total HAP emissions.
- c. For all combustion sources of HAPs at the facility:
 - i. The total volume of natural gas burned; and
 - ii. The total HAP emissions calculated using emission factors from AP-42, Section 1.4, 7/98 or any later edition.

The total combined HAP emissions for all emissions units of each single HAP and total combined HAPs [summation of III.3.a.v for all HAPs emitted by the coating lines, III.3.b.i for all HAP emissions from the vapor degreaser (emissions unit L001), and III.3.c.ii for all HAP emissions from combustion sources].

IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing the use of non-complying coatings (VOC content greater than 3.0 pounds VOC per gallon, excluding water and exempt solvents). The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days after the exceedance occurs.
2. The permittee shall submit deviation (excursion) reports which identify each day where the daily VOC emission rate exceeded 5.0 pounds per day for this emissions unit (K050). The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days after the exceedance occurs.
3. The permittee shall submit deviation (excursion) reports which identify each month during which the rolling 12-month VOC emissions from this emissions unit (K050) exceeded 0.91 tons per year, and the actual rolling, 12-month VOC emissions for each such month.
4. The permittee shall submit deviation (excursion) reports which identify each month during which the rolling, 12-month emissions of any single HAP from all emissions units at the facility exceeded 9.9 tons per year, and the actual rolling, 12-month emissions of each such single HAP for each such month.
5. The permittee shall submit deviation (excursion) reports which identify each month during which the rolling, 12-month emissions of combined HAPs from all emissions units at the facility exceeded 24.9 tons per year, and the actual rolling, 12-month emissions of combined HAPs for each such month.
6. The permittee shall submit annual reports which specify the actual annual VOC emissions for this emissions unit (K050). The reports shall be submitted by January 31 of each year and cover the previous calendar year.

7. The permittee shall submit annual reports which summarize the facility-wide emissions of each single HAP and combined HAPs from all emissions units at the facility. The reports shall include emission calculations, be submitted by January 31 of each year, and cover the previous calendar year.

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 method(s):

- a. Emission Limitation:

VOC emissions shall not exceed 5.0 pounds per day.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section A.III.1.

- b. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section A.III.2 and the testing requirements in Section A.V.2.

- c. Emission Limitation:

VOC emissions shall not exceed 0.91 ton per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined by summing the monthly VOC emission rate in Section A.III.2 on a rolling, 12-month basis for the first 12 months of operation after issuance of this permit and on an annual basis thereafter.

- d. Emission Limitation:

The emissions of each single hazardous air pollutant (HAP) from emissions units K007, K009, K010, K011, K012, K013, K039, K040, K041, K042, K043, K044, K045, K046, K047, K048, K049, K050, L001, and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section A.III.3 and maintenance of a rolling, 12-month summation of HAP emissions for each single HAP.

e. Emission Limitation:

The emissions of the combined HAPs from emissions units K007, K009, K010, K011, K012, K013, K039, K040, K041, K042, K043, K044, K045, K046, K047, K048, K049, K050, L001, and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Section A.III.3 and maintenance of a rolling, 12-month summation of combined HAP emissions.

2. US EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K050 - fluoropolymer dip (FP-Dip) coater and electric drying oven 55 (OV-55)	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